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4 SELECT COMMITTEE TO INVESTIGATE THE
5 JANUARY 6TH ATTACK ON THE U.S. CAPITOL,
6 U.S. HOUSE OF REPRESENTATIVES,
7 WASHINGTON, D.C.

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11 DEPOSITION OF: TREVOR HALLGREN

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15 Thursday, April 7, 2022

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17 Washington, D.C.

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20 The deposition in the above matter was held via Webex, commencing at 10:05

21 a.m.

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2 Appearances:

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5 For the SELECT COMMITTEE TO INVESTIGATE

6 THE JANUARY 6TH ATTACK ON THE U.S. CAPITOL:

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8 [REDACTED] STAFF ASSOCIATE

9 [REDACTED] INVESTIGATIVE COUNSEL

10 [REDACTED] PROFESSIONAL STAFF MEMBER

11 [REDACTED] CHIEF CLERK

12 [REDACTED] PROFESSIONAL STAFF MEMBER

13 [REDACTED] SENIOR INVESTIGATIVE COUNSEL

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2 [REDACTED] Today is April 7, 2022. This is the deposition of Mr. Trevor Hallgren
3 by the House Select Committee to Investigate the January 6th Attack on the United States
4 Capitol pursuant to House Resolution 503.

5 My name is [REDACTED] I'm an investigative counsel designated by the select
6 committee to conduct this deposition. I'm joined also by [REDACTED] a member of the
7 committee staff.

8 We may be joined by members of the select committee, Mr. Hallgren, and if they
9 join, they are entitled to ask questions. They may or may not join. I can't forecast
10 whether they will be with us today. If they do pop in on the Webex platform, we'll
11 pause to make sure that it's clear that those people have joined us.

12 The Witness. Okay.

13 [REDACTED] Now, under the House deposition rules, neither the committee
14 members nor the staff may discuss the substance of your testimony unless and until the
15 committee approves the release of the transcript, and we'll be in touch with you about
16 that ahead of time.

17 At this time, Mr. Hallgren, I'd ask that you identify yourself for the record, and
18 spell your first and last name.

19 The Witness. Sure. My name is Trevor Hallgren, T-r-e-v-o-r, last name
20 H-a-l-l-g-r-e-n.

21 [REDACTED] Perfect.

22 And I would say that you are already doing a great job of speaking slowly and
23 clearly, something I can sometimes run afoul of in these proceedings. So I appreciate
24 that.

25 I'll talk a little bit about some ground rules for the deposition. First, in terms of

1 who is present, before we went on the record, I already identified myself and [REDACTED]
2 Some other people who are here, technical support staff. There are no other
3 representatives from other government agencies present.

4 Under the House rules, you may be present, along with an attorney, if you choose.
5 It's my understanding that you are here without an attorney. Is that correct?

6 The Witness. That's correct.

7 [REDACTED] And I'd ask that you confirm that there's no one else present with
8 you where you're sitting for the deposition.

9 The Witness. No, there's not. I'm alone.

10 [REDACTED] And also confirm that you're not recording this on your side.

11 The Witness. That's correct, no recording.

12 [REDACTED] Great. And that's important because the official reporter is
13 transcribing our conversation. We'd ask that you wait for our questions, and we'll wait
14 for your answers, and that way we're not talking over each other. Also, because this is
15 transcribed into a written record, nonverbal responses, like shaking or nodding your
16 head, cannot be recorded.

17 For the purposes of our conversation today, we ask that you give complete
18 answers to the best of your recollection. What that means is, if you don't know the
19 answer, it's fine just to say so. If you need us to clarify our question, you can just ask us
20 to do that, and we'll do our best to make clear what we're asking.

21 If at any point you need to take a break, that's fine, just let us know, and we can
22 go into a recess and, you know, take a few minutes for either comfort breaks, stretch
23 your legs, get a drink of water, that kind of thing.

24 You may not refuse to answer any questions unless you're basing that refusal on a
25 legal privilege recognized by the committee. And if you refuse to answer a question

1 based on a privilege, we can either move on from that question and come back to it later
2 or we can go to the chairman of the committee to seek a ruling on the objection. If the
3 chairman overrules the objection, then you would be required to answer the question.

4 And then, finally, I would remind you, as we do for all of our witnesses in this
5 investigation, that it is unlawful to provide false or material and misleading information to
6 Congress, and doing so could result in criminal penalties under Federal law.

7 Mr. Hallgren, do you understand everything I've said so far?

8 The Witness. Yes. I believe so, yes, sir.

9 [REDACTED] Great. So without further adieu, I'd ask that the official reporter
10 swear the witness in.

11 The Reporter. Do you solemnly declare and affirm under the penalty of perjury
12 that the testimony you are about to give will be truth, the whole truth, and nothing but
13 the truth?

14 The Witness. I do.

15 [REDACTED] And, Mr. Hallgren, thank you. You can put your hand down.

16 EXAMINATION

17

BY [REDACTED]

18 Q We have a few exhibits that we're going to show you on the screen today.
19 We might not go exactly in order, and I know that because the very first one I have to
20 show you is actually the last numbered exhibit, exhibit 16.

21 If we could pull that up. And this helps us test out the technology.

22 Can you see that document on your screen?

23 A Yes. Yes.

24 Q Okay.

25 A I actually have that here with me.

1 Q Perfect. So exhibit 16 is a copy of the subpoena issued by the select
2 committee to you. And I'd like to ask you to confirm that you are the Trevor Hallgren
3 who's named in the subpoena.

4 A That would be me, yes.

5 Q I want to say for the record, Mr. Hallgren, that you have been prompt and
6 responsive to the subpoena, and we appreciate that. You have produced photographs
7 and videos to us, and you've been vigilant about doing so in a timely manner, and we
8 really do appreciate that.

9 That said, we do want to confirm some of the methods that you've used to
10 identify documents and photographs that were called for by the subpoena.

11 So if we go to page 5 of this exhibit, this is -- actually, you can see at the top it says
12 "Schedule." This was the third page of the letter that accompanied the subpoena from
13 the chairman of our committee. And it identifies four categories of documents and
14 communications that you were required to search for and produce to the select
15 committee.

16 Those four categories generally summarized our first -- or the topics, I should
17 say -- first, a visit that you made to the United States Capitol Complex on January 5th,
18 2021; second, rallies or protests in Washington, D.C. on January 5th or 6th, 2021; third,
19 the attack on the United States Capitol on January 6, 2021; and then, fourth, sort of a
20 catch-all category, anything that might be related to a government investigation after
21 January 6th about those first three categories.

22 So I'd like to ask you, Mr. Hallgren, to the best of your knowledge, have you made
23 every effort to search for the items that have been called for by the subpoena?

24 A Yes. I mean, you know, mostly everything, you know, that I was able to get
25 to you, I mean, you know -- and we talked about that before, I think I explained that there

1 was one -- at least one photograph that was taken in the Raymond -- Rayburn Building,
2 I'm sorry, on January 5th that I cannot find, but I believe I explained to you what that was
3 also.

4 And then there was a video posted to Facebook that I don't have any way or any
5 knowledge of how to retrieve. That video was not saved when it was recorded. So,
6 you know, I don't really know how those things work either, if it's on there for a day, or if
7 it's on there for a month, or if it's on there forever, but I just know that I don't have it and
8 I don't know how to access it.

9 So those are the only two things that I'm aware of that I would've had that you
10 don't have. And, again, everything else, I searched through everything else. I didn't
11 think that there was any emails, and I did go back, you know, I mean, as far as I could. I
12 know that, you know, over the past year anyways, for various reasons, with switching
13 phones and things, I had a -- matter of fact, the phone that I had in Washington, D.C. was
14 on a -- the memory was full. And that prompted me to get a new phone this summer
15 just without -- I mean, I would try to delete apps, delete apps, and deleting things.

16 So I searched between both phones. I don't believe I found any emails that I was
17 able to send to you. And like I said, I don't recall making any emails at all. I think I sent
18 you one or two text messages maybe, again, that I was aware of and searched for
19 particularly, along with other things. And like I said, anything else really -- I'm not aware
20 of anything else being out there and I didn't find anything else.

21 Q Thank you for that explanation.

22 I just want to clarify a couple of things on the record. Based on -- you mentioned
23 things that you had previously told us when we had a phone conversation. So you
24 mentioned a photograph that you knew was taken but you couldn't find. I think you
25 previously -- correct me if I'm wrong, but that was a photograph of you sitting in

1 Representative Loudermilk's office in Washington, D.C. is that right?

2 A Yes.

3 Q Okay. And then what was the Facebook video that you said you knew that
4 you had previously posted but it sounds like you can't find now?

5 A That was explained to me by the -- I mean, again, it was something that I had
6 totally forgotten about. It was when the Homeland -- I believe it was Homeland Security
7 that came to my house last summer, they had questioned me about the video and
8 brought it to my recollection of when we arrived there at the Washington Monument the
9 morning of January 6th and we were getting off the buses.

10 And I had started -- and I mean, I do -- I do recall this, you know, at this point, like I
11 said, just something that I hadn't thought about or whatever. But after being reminded,
12 I mean, I can recollect doing the action of recording a video when we got off the bus.
13 And what exactly I may have been saying or whatnot -- just basically recording the
14 moment, you know what I mean, Here we are the morning of January 6th getting ready to
15 listen to President Trump, you know, I mean, something like that. I don't know. I
16 mean, I maybe shouldn't even say because I don't know exactly what was said on there.

17 The gentleman that organized our trip came past, and I do remember recognizing
18 him or speaking to him, and I said something along the lines -- again, they told me this
19 past summer, but I've forgotten -- Here's our fearless leader, or something like that,
20 something to that extent, maybe not verbatim, but along those lines.

21 And then there was just a brief recognition. And, again, the organizer, he was
22 with two other, I believe, members of the group. He was pushing an older gentleman
23 that was with us that was in a wheelchair, so he was pushing him, and I guess that he
24 did -- there was a flag. And this is -- again, this was told to me, again, by the Homeland
25 Security, and I probably vaguely remember that flag being there. But it was mentioned

1 that there was something on the end of the -- on the end of the flag and that the
2 organizer of our group had mentioned that that was something going to be maybe for
3 Pelosi, or something like that.

4 But, again, my recollection of, you know, exactly what transpired -- like I said, I can
5 remember getting off the bus. There was a lot of adrenaline, I guess. You know, I
6 mean, anticipation, excitement, and things.

7 So what exactly transpired, that's what -- that is what was reconveyed to me this
8 past summer. So, basically, most of that -- other than, like I'm saying, I do recognize and
9 acknowledge that that scenario, that situation did occur. But exactly what was said or
10 transpired, I could not really confirm or deny one way or the other totally.

11 Q Okay. That's great. And we'll talk more about that when we get to the
12 morning of January 6th. But I really appreciate that explanation, and we'll keep that in
13 mind as we get towards that discussion, because we also have questions about what you
14 just talked about.

15 But I just want to confirm, right now we're just going through the subpoena sort of
16 document production requirements.

17 Now, I just want to confirm, you currently use a cell phone that ends in [REDACTED]
18 correct?

19 A Correct.

20 Q Now, was that the cell phone that you were using during the time period of
21 December 2020 through January 2021 -- the phone number?

22 A The -- yes, it would have been.

23 Q Do you have any other phone numbers that you would have been using
24 during that time period?

25 A No.

1 Q And also, yesterday, did you receive an email from me at your personal
2 Gmail address with the instructions for how to log on to this deposition today?

3 A I did.

4 Q Were you using that Gmail address during the time period, December 2020
5 through January 2021?

6 A Yes.

7 Q Were you using any other email addresses during that time period?

8 A No.

9 Q Now -- go ahead.

10 A I'm sorry. I am a student in school, so I would have had -- let's see,
11 2020 -- that would have been my technical college -- yes, my technical college email
12 address, of which I'm not even sure what that -- it really didn't work the whole time I was
13 in school, so I never used it. But that email was there, not really used, though.

14 Q Okay. And that's helpful. That answers my follow-up question, which
15 was, you were not using that email address for any correspondence that would have been
16 related to traveling to Washington, D.C., were you?

17 A No.

18 Q Now, you mentioned having produced some text messages to us, some
19 photographs that you took of messages. What application were you using for those text
20 messages? Was it just the normal text messaging on the phone or was it WhatsApp or
21 Telegram, something like that?

22 A I think -- excuse me. I think one of the -- because I believe I sent you two, if
23 I'm remembering that's correct. So one I believe was taken -- or, of course, I'm not
24 exactly -- excuse me. I'm not exactly sure. It may have been -- if I can answer like this
25 just as to -- because like I said, I'm not 100 percent certain. It may have been possibly

1 through a Telegram message or chat -- I'm not sure -- or it could have been from straight
2 regular texts. And I don't, again, know what -- just from my phone number to somebody
3 else's phone number, whatever that goes through on.

4 That was for one of them. And the -- again, the -- I think, actually, both of them
5 were, because the other one was just where, I'm remembering now, somebody in our
6 group or something had asked if -- or not in our group. I think maybe they were with
7 another group that met up with us on the trip in South Carolina. So they were kind of
8 with us but not with us, if that makes sense. They were traveling with us, but they
9 weren't necessarily part of the trip that left from Georgia. We met up with them I
10 believe it was South Carolina.

11 And there was a situation where me and another companion -- or, I guess,
12 member of this trip, actually that's the first text message, like I'm saying, was sent to, him
13 and I were together. And we had kind of gotten separated from our group from
14 Georgia, so we ended up on this bus from South Carolina. And there was a girl on
15 there -- again, I don't know who it would have been or whatever, but I guess something
16 about she had left her purse or somebody had her purse or something, I think is what it
17 was about --

18 Q Was this a communication about trying to get someone's phone charger
19 back to them?

20 A Yes, that's what it was. I'm sorry. It wasn't a purse. I couldn't
21 remember exactly what it was. Yes, yes, that one.

22 Q Okay. So it sounds like it's possible that, during this time period, you were
23 using messaging applications separate from just traditional text messages. Is that right?

24 A I think that, again, those two conversations were done probably on regular
25 text messages. I mean, I use Instant Messenger, but, again, nothing in there -- and like I

1 said, there was the Telegram account. Now, I had mentioned from the group of
2 us -- and I don't know if I mentioned this to you, but, again, I can remember speaking with
3 the gentlemen investigators, I believe, from Homeland Security that came by my house in
4 the summer of 2021, and told them that I did have a Telegram account that was -- or
5 within that, the group from Georgia, some of the people had established kind of like
6 a -- like a just to keep in touch chat group or whatever, if they're called.

7 And I think -- I joined that. I did join that group. And I think I may have posted
8 two or three messages to that, but it was just basically, you know, Hey, I'm joining the
9 group and, you know, thank you. And, again, I mean, just basically, you know, I don't
10 really know how to use these platforms or, you know, anything, so basically forgive any
11 ignorance that I have if I'm on here. But, again, that was it.

12 And then the Telegram account, I don't even know if that's still on my phone or
13 not, but I wasn't able to get into that with that -- with the incapab- -- with the memory
14 full on the phone. Just that's why I said, that's one of the reasons why I got another
15 phone this summer. The phone just basically kind of quit, quit working.

16 Q So do you recall using any social media applications' messaging services to
17 communicate about the trip to D.C.?

18 So, for example, Facebook has messaging or Instagram has direct messaging,
19 Twitter has direct messaging, anything like that to communicate about the subjects
20 covered by the subpoena?

21 A No. Like I said, the -- I used Instant Messenger. I'm not sure who that's
22 through, if that's their own entity, so to speak, or if that's connected to Google or
23 Facebook, whoever that's with. And I mainly communicate on there primarily with my
24 wife. We keep in touch, you know what I mean. It's how we send our messages pretty
25 much together.

1 And then within Facebook, again, not like a -- other than just commenting on like
2 if somebody made a post or something, I mean, that was basically my interaction
3 through. But, again, like a direct text communication personal, no.

4 Q Okay. Well, and this is not a memory contest. We're just trying to make
5 sure that we've covered the waterfront in terms of getting the information about the
6 topics in the subpoena.

7 It sounds to me that, to the best of your knowledge, you've produced everything
8 that's in your possession. Is that right?

9 A Yes.

10 Q And did you, to the best of your knowledge, delete or destroy anything that
11 would have been covered by the subpoena? Not asking whether you don't have access
12 to it, because I understand there's some stuff that may be on this old phone, you didn't
13 delete or destroy that; it just was inaccessible to you.

14 Separate from that, you know, like, for instance, following January 6th, are there
15 any photos or videos that you deleted that if you hadn't deleted would have been called
16 for by the subpoena?

17 A I don't believe so. You know, again, they're not -- it wouldn't have been
18 anything that I would've deleted. But, again, as we spoke in prior conversations, I mean,
19 basically, they're not really -- you know, again, I don't sit and look at them. So, you
20 know, I mean, I wouldn't have even gone to them for the most part. I mean, I might
21 have viewed them once or twice, but that's the extent. Wouldn't have been any
22 deletions or anything, no.

23 Q Okay. Thank you for that.

24 And this is not a memory contest, so I appreciate you being as -- taking all this
25 extra effort to really remember. We appreciate that, but we'll move on to some easier

1 questions now.

2 In what city and State do you currently live?

3 A I live in Villa Rica, Georgia.

4 Q And, Mr. Hallgren, what do you do for a living?

5 A I am a student, a full-time student.

6 Q And what kind of education are you pursuing right now?

7 A I am majoring in criminology and minoring in legal studies of which I'm
8 finishing my junior year.

9 Q Now, were you living in Villa Rica in December 2020 through January 2021?

10 A Yes.

11 Q And what were you doing for a living during that time period?

12 A The same. I've been in school on a full-time basis for at least -- about the
13 last 4 years, and a little bit of part time prior to that.

14 Q Okay. Now, forgive me for making assumptions, but is it fair to say that this
15 is you returning to school after having been in the workforce for some time before that?

16 A Yes, yes.

17 Q So before becoming a full-time student, what kind of profession were you
18 in?

19 A I did a little bit of everything throughout my life, but before that, before
20 going to school -- actually, while starting school, I've been a bartender. I was a
21 bartender for a long time, long time.

22 Q And how old are you, if you don't mind me asking?

23 A I just turned 51 -- or couple weeks ago -- I'm sorry -- last month. Geez.

24 Q A belated happy birthday.

25 A Thank you.

1 Q Now, in the 2020 election season, did you work for, either paid or voluntary,
2 for any political campaign?

3 A No.

4 Q I'm trying to -- and I see the look on your face. I just want to distinguish
5 between -- I'm not saying whether you were supporting a particular candidate. I
6 mean --

7 A Actually working?

8 Q -- if you were actually working with a campaign, either being paid or just
9 volunteering to go knock on doors, hand out leaflets, that kind of thing, during the 2020
10 election season.

11 A No, I did not work. I was entertaining the idea to do that, and this would
12 have been the early part, I believe, of 2021, like March, I believe.

13 Q Of 2021?

14 A Of 2021.

15 Q Okay. But the preceding Presidential election season --

16 A Prior to? No.

17 Q Okay. And before traveling to Washington, D.C. in early January of 2021,
18 did you participate in any demonstrations or marches or protests following the November
19 Presidential election?

20 A Prior to July -- I'm sorry. What was the date again?

21 Q So I ask in particular because we know that you live in Georgia.

22 A Yes.

23 Q In Georgia, following the November 2020 Presidential election, which was
24 the first week of November, there were various events, protests, demonstrations in the
25 State. So, for instance, we know -- it's been publicly reported -- there were

1 demonstrations at the State Farm Arena, which is where ballots were being counted, and
2 there were demonstrations at the Georgia State Capitol Building and other places around
3 administrative offices in the State of Georgia having to do with election issues.

4 So the question is: Following that Presidential election, were there any events
5 that you attended before you went to Washington, D.C.?

6 A Yes. I'm trying to think. I attended -- so this would include right prior
7 before the election too or do you want from after the election?

8 Q After the election.

9 A After the election, I think the two events immediately after the election,
10 there was -- I forget where it was, but there was a rally that President Trump held. I
11 want to say that that was maybe the Valdosta area. I went to that. And I know this
12 was after the election, but I'm not sure of the date. I mean, I know it was
13 before -- before January, so -- and I want to say probably more so in November, but there
14 was a protest in front of the Governor's mansion here in Georgia, and I don't know the
15 date. I don't know if there were several of those or whatever, but I was there for --

16 Q Tell us what you remember about the Governor's mansion demonstration,
17 you know, who was organizing it and what drew you to that.

18 A Oh, I don't really know who was organizing it. Most or I would say any and
19 probably all of the events or anything that I've gone to or participated with have come
20 through Facebook, finding out about them on Facebook, you know, either somebody has
21 posted or something like that.

22 Now, sometimes, I mean, I would, you know, search for President Trump's rallies
23 or something like that, I would do a search. But, again, the majority of everything would
24 be -- I would find out through Facebook.

25 Q Are you familiar with the name Ali Alexander?

1 A Not familiar, no. I don't know if -- you know, maybe it's something -- or a
2 name that I've heard before, but I have no idea.

3 Q Or an organization, like an actual organization called Stop the Steal?

4 A I've heard the phrase.

5 Q Sure. Yeah. And I think a lot of us have. And we're just trying -- there is
6 an organization that's actually called Stop the Steal, which is a little confusing because,
7 obviously, "stop the steal" was sort of a slogan used by lots of people during the election
8 season.

9 But I was just asking that to see if any of those ring a bell with relation to the
10 Governor's mansion event that you went to?

11 A No. And in any of these events or whatever that -- again, you know, I
12 mean, I traveled, you know, I mean, by myself. I mean, you know, as far as, obviously, I
13 mean, I went with a group, but it wasn't like I knew anybody there in that group or
14 anything. Again, it was something that I came across, I believe, from Facebook, and I did
15 want to attend the January 6th protest in Washington, D.C.

16 So, you know, I mean, when I saw that, it caught my eye, and I did inquire about it
17 because it was something that I did want to attend.

18 Q So let's jump right to that then.

19 How did you first hear about the gathering in D.C. for January 6th?

20 A Okay. Well, I guess if you're saying first heard about it, I imagine that
21 would have probably come through, if not President Trump himself, I mean, the regular
22 news organizations, you know, on TV. I guess, yes, I guess, that's probably how I would
23 have first heard about it. And, again, it just immediately did, you know, pique my
24 interest and attention that, you know, that I would want to be there for that moment in
25 history, in our country's history and --

1 Q Did you follow -- sorry. Did you follow the President on Twitter?

2 A No, no. I don't use Twitter.

3 Q Okay. Sorry. I interrupted you there. I just wanted to make -- I don't
4 want to -- I shouldn't have done that. I apologize.

5 A That's fine.

6 And then, like I said, you know, I -- so when I had the interest of the event that
7 was going to take place, you know, I was trying to think, you know, I mean, can I drive up
8 there? Am I going to -- you know, how would I do this, you know what I mean? You
9 know, is there -- and so, you know, I mean, all the different thoughts: How can I get
10 there? How can I get there? Is there the possibility to fly? Where would I stay when
11 I get there? All those questions.

12 But then, like I said, on Facebook, I just happened to -- I don't know, Facebook's
13 probably something I really need to get away from. You know, it's one of those things I
14 spend way too much time, but at some time, you know, when I was just, I guess, killing
15 time, which I don't really have much of to do these days, I guess, being unproductive, but
16 I came across -- I came across the ad and, I mean, I immediately tried to reply and
17 respond to it.

18 Q Let's pull up exhibit 1.

19 Mr. Hallgren, these are -- we've sort of divided these out. This first exhibit are
20 some of the photographs that you sent us that appear to be a text conversation or text
21 thread with someone named Danny Hamilton.

22 A Yes.

23 Q And it says here, you know, December 24, 2020. The text says: Here's
24 your once in a lifetime chance to travel with Danny Hamilton's world famous Trump bus
25 to.

1 And it talks about the Save America Tour to D.C./March on Congress, January 6th,
2 2021. And it goes on to give details about where, if you're interested, the buses will be
3 leaving from.

4 If we scroll to the next page, you can see there's an address given there in
5 northwest Atlanta.

6 Then it doesn't look like from that you responded. Four days later the same
7 message appears to come in. Again: Here's your once in a lifetime chance.

8 And if we keep going down, it's the same message again.

9 By January 1st, the message from Danny Hamilton now says: Things we suggest
10 to bring on the trip. And it goes through a list of items like folding chairs, a backpack,
11 towel for a shower, personal items, that kind of thing.

12 First, let me just ask you, who is Danny Hamilton and how do you know him?

13 A Danny Hamilton was, I guess you could say, the organizer of the trip that left
14 from Atlanta or Georgia to go to Washington, D.C.

15 I don't know if I should really speak of -- I mean, you know, what -- because I don't
16 really know. I don't know him personally. I just know that he was the acting
17 coordinator. So we traveled on -- there was five or six buses that left from Atlanta, and
18 he was the coordinator or organizer of that trip.

19 Now, again, back history from him or anything else, again, I don't know if I should
20 really -- because I don't know. What I heard or what, I guess you say yes, what I heard
21 about him is that he used to coordinate like music tours for various music groups, and he
22 used to run tour buses. That's my understanding.

23 And, again, you know, I mean, I don't know if I should say that because I don't
24 really know. That's just kind of what I heard through the grapevine of being, you know,
25 on the trip.

1 Q So do you know how he came to send you the first text message on
2 December 24th?

3 A I have a good idea, let me say it like that, because, again, I'm not -- you
4 know, this was a while ago for me and, you know, the saying about living a day in the
5 shoes or walking in somebody's steps, I mean, my life has just had so many things going
6 on over the last couple years. But I believe what happened here -- and I think that this
7 is, again, the way that I told it to the investigators that came by to my house last
8 summer -- was that, as I mentioned, I came across the ad on Facebook. And I believe
9 what happened -- again, I'm not going to say that this is exact, but I think what took place
10 was, when I saw the ad -- and I do believe that date on there of those text messages that
11 you have on the screen, the first and the initials, was December 24th. And that's what I
12 told the investigators last summer. I couldn't remember if it was Thanksgiving or
13 Christmas or when. I believe I told them I thought it was Thanksgiving because, again, I
14 thought that, you know, maybe I had set or -- you know, set the -- made my plans to go to
15 Washington, D.C., prior to this. I -- you know, again, you know, I didn't realize that it
16 was so close. I mean, looking at that, I mean, that's, you know, less than 2 weeks before
17 the trip.

18 But what happened was, when I saw the ad on Facebook and there was, I guess,
19 the number there, I called the number immediately. And I guess, you know, maybe it
20 was his personal number or whatever. I wasn't even thinking that it -- you know,
21 obviously, that's Christmas Eve. Again, you know, as chaotic as my life is sometimes,
22 you know, that date at that moment wasn't significant to me. And it was late -- not
23 extremely late, but it was in the evening hours, 6, 7, 8 o'clock at night, and I dialed the
24 number, again, because, as I mentioned, I wanted to go.

25 And I called, and it was Danny that picked up the phone. And, you know, I asked

1 him, I said, you know, Is this Danny Hamilton? And he said yes. And I said, I'm
2 interested in going -- you know, going on your trip to Washington, D.C. And all -- I
3 mean, he just responded to me as, Why are you calling my house at, you know, 6, 7,
4 8 o'clock at night on Christmas Eve? And I mean, I can remember -- I don't remember
5 the Christmas Eve part, but I do know that it was a holiday that I called him on, basically,
6 or whatever. And so that's how I think that took place.

7 And then I think what we did on that phone call was we exchanged
8 numbers -- well, I gave him my number and information, because he had told me he
9 didn't know if -- he thought that there might be a spot for me, but he wasn't exactly sure,
10 that he would get back to me. But I left him my information.

11 So I'm not sure if he maybe sent this text out after that phone conversation to
12 make sure that I still had, you know, all of his information. To my recollection, again,
13 that's kind of how the -- I guess if you want to say introduction or scenario to that text
14 message went.

15 Q So let me just maybe summarize, and you tell me if I have it about right.

16 You saw on Facebook an ad or a posting of some kind saying that a group of
17 people from Georgia was going to travel to Washington, D.C., for this event for
18 January 6th. And it had a phone number on it, and you reached out to that phone
19 number, and that's how you connected with Mr. Hamilton, to the best of your
20 recollection?

21 A To the best of my recollection, yes. I mean, there was some type of social
22 media or advertisement that I came across from -- and, again, I would just have to guess
23 that that would have been Facebook.

24 Q Did you have to pay any costs to go on the trip?

25 A Yes.

1 Q Like buying a ticket for a seat, something like that?

2 A Yes.

3 Q Do you remember what those costs were?

4 A I think the entire cost was \$500.

5 Q And what did that cost cover, if you remember?

6 A Well, we rode, like I said -- so it covered breakfast the morning that we met
7 to leave at this diner in the downtown Atlanta area or the Atlanta suburb area, the trip -- I
8 mean, you know, the trip up there. They were nice tour buses. So, I mean, they had
9 beds in them. Nothing extravagant. I mean, it was -- I didn't realize there were those
10 things you actually sleep in what is essentially, basically, a little coffin, but that was there
11 to sleep in. And then -- you know, so it was a big -- I mean, there was some rooms on
12 the bus, you know, where you could get up and sit and eat and bathrooms and things like
13 that.

14 So it covered that, which like I'm saying, it wasn't like you were just sitting there
15 on one of these buses with a seat. I mean, you know, it was kind of an elaborate, like I
16 said, musicians or some type of a performers tour bus.

17 And then it covered we stayed in a campground. And I said, I don't know the
18 name of the campground. I want to say that that was maybe in Maryland, but I'm not
19 sure. So it, you know, covered, you know, I mean, that's where we got to that evening.
20 That night we stayed there. We had a couple of cookouts. So it covered that type of
21 food, you know. Like in the evening, we would eat, and it covered that food. Again,
22 the transportation into Washington, D.C. on the morning of January 6th, transportation
23 back to the campground. He provided, I guess, like a souvenir package, and then the
24 transportation back, I guess.

25 Q Okay. That's very helpful.

1 So it's nice to know about the accommodations, because from the outside looking
2 in, it might look like it's basically just like a charter bus, almost like a Greyhound. But
3 you're saying these were more elaborate sort of tour buses where that's actually where
4 you stayed overnight while you were on this trip, on the buses?

5 A Yes, in a campground. And like I said, I believe that was in Maryland, but
6 what the name of it was or exactly even if it was Maryland, I'm not sure.

7 Q Now, did you take anyone along with you, a friend or a family member, for
8 the trip?

9 A No.

10 Q So did you know anybody else before you went on the trip socially?

11 A No.

12 Q To the best of your recollection, about how many people went with Mr.
13 Hamilton's group of buses?

14 A So, like I said, I believe that there was five buses, and each bus -- I guess
15 people that signed up for the trip, there was 12 people -- 12 people that could sign up
16 now and, I mean, the bus would have a driver. And I don't know if there was like -- if
17 there was like maybe two drivers to some of the buses. So I guess that would be
18 probably around 70 people, if you include the drivers. And, again, I don't know if there
19 was maybe like a mechanic or something if the buses broke down. I have no idea, but --

20 Q To the best of your recollection, it was about 12 passengers per bus?

21 A Per bus, yes. Yeah, passengers, that's the word.

22 Q And just to make sure logistically I have it right, according to the text
23 messages, it was, you know, people were leaving the morning of January 4th. Is that
24 when you left?

25 A I'm not really sure, but I guess so. I mean, I don't remember specifically,

1 I'm sorry, what morning we left. We left early one morning. I think we met again at
2 this diner at like 5:00 or 6:00 in the morning. I think we were scheduled to leave at 9:00
3 in the morning, and we left right around that time, you know. I mean, we might have
4 been a little bit late pulling out. But the exact date, probably was the 4th, but I don't
5 know.

6 Q Let's pull up exhibit 2.

7 Mr. Hallgren, we were able to go find what seemed to us to be your Facebook
8 profile that you may have been using during this time period.

9 A Sure.

10 Q Does this look like a post that you made on Facebook?

11 [REDACTED] maybe we could zoom in on it.

12 A Yes, I can see it.

13 Q Okay. So the date on this is January 4, 2021.

14 A Okay.

15 Q The time of the post, it doesn't show up here, but I can tell you that when
16 you're looking at it online, Facebook indicates at least the post was up at about 7:19 in
17 the morning on January 4th.

18 It looks like a picture of a bus with President Trump's photo on it. It says: Keep
19 America great! Trump 2020.

20 And the caption is: Getting ready to go to --

21 What's the rest of that caption, Jacob?

22 Getting ready to get on the road to Washington, D.C.

23 So based on this, is it fair to say that you left Atlanta the morning of January 4th?

24 A Yes, yes. Then that would be correct.

25 Q Now, one thing I wanted to -- before I forget, we don't have to pull it up, but

1 maybe you remember from looking at these text messages recently. One thing that
2 Danny wrote in the text messages with instructions was, he said, No guns allowed on the
3 bus.

4 Do you remember that?

5 A Yeah, I do remember seeing that in the message there.

6 Q Now, to the best of your recollection, did anyone bring any guns on the
7 buses?

8 A No.

9 Q Did you see anyone with weapons on the buses other than guns?

10 A No. No.

11 Q Now, when you were driving on your way to Washington, D.C., did anyone
12 talk about plans to protest in front of the Capitol Building?

13 A No. I slept the majority of the trip and kept to myself a lot. But, no, I
14 didn't -- I didn't hear anything like that.

15 Q So did you hear anybody talk about entering the Capitol Building?

16 A No.

17 Q What about, did anyone use the phrase "Insurrection Act"?

18 A No.

19 Q Now, when you're on this bus trip -- not just on the trip up, but throughout
20 the entire time you're with this group, did anyone mention being a member of groups
21 called the Oath Keepers?

22 A No.

23 Q What about the Proud Boys?

24 A No.

25 Q Or the Three Percenters?

1 A No.

2 Q There's another group called First Amendment Praetorians. Any mention
3 of them?

4 A No.

5 Q Now, for those four groups, have you ever been associated with any of
6 them?

7 A No.

8 Q Did anyone bring with them helmets?

9 A No.

10 Q Bear spray or mace?

11 A That, I don't really know. I heard people talk about having mace, but I
12 don't know if they had it -- actually had it or -- again, I did not see any, any physical
13 containers.

14 Q Do you remember the context in which people talked about having mace?

15 A It was in reference to if, you know, I mean, if there would be any
16 like -- maybe the word -- I don't know if this is the best choice of word, but opposition or
17 problems from groups like antifa or any other, you know, group or organization that, you
18 know, wouldn't be in support of the protest of January 6th.

19 Q During the entire time that you were in Washington, D.C., did you personally
20 observe any opposition groups like that?

21 A No. No. I can say that I was -- there was a particular time when I was
22 worried about it, but, no, we didn't see anybody, again -- or at least that we were aware
23 of necessarily.

24 Q Okay. When you say you were worried about it, what does that mean?

25 A Well, after -- on the evening of January 6th, there was myself and another

1 gentleman that was on our trip from Atlanta. He was actually on the bus that I was on.
2 And him and I were together, and we kind of got sep- -- most of the group wasn't -- I
3 mean, you never really stayed together as a group. It was a function where we were
4 there and you kind of got -- you did what you were going to do. Some of us, you know, I
5 mean, tried to stay together and do things as a function, again, basically our bus, a few of
6 us on the bus.

7 But anyways, on the evening of January 6th, we could not find the location -- the
8 pickup location for where our bus was at, and we actually ended up getting left. That's
9 how we ended up on the South Carolina bus, because we missed our bus. And so, you
10 know, we were a little bit nervous about maybe getting -- you know, because, I mean,
11 that was kind of relayed and put out there, you know what I mean, if you miss the buses
12 going back, you'll be on your own. And, of course, we were trying to make those
13 preparations. I mean, we were trying to call Lyfts and, I mean, that was impossible.
14 There was no phone signals getting out. There was nobody going to drive into
15 Washington, D.C., that day anyways.

16 So, I mean, we were a little bit nervous, you know, about getting stuck down
17 there. Fortunately, like I said, we were able to -- I don't know how we did it, got ahold
18 of somebody, or whatever, found our way to that other bus.

19 Q Got it. So the evening of January 6th, you were basically kind of a little bit
20 lost for a moment in terms of not being connected with your group, and maybe that's
21 when you had some concerns about safety. But nothing ever actually came to fruition in
22 terms of, you know, seeing opposition groups or actually, you know, being threatened by
23 anyone?

24 A Correct. You know, and I mean, I guess I could just tell you, I mean, you
25 know, did I see people there in the crowd that day, especially either on the way to the

1 Capitol -- not with us, but -- you know, I mean, I can remember seeing a group of just, you
2 know, some guys, people that did have, you know, I mean, helmets as you mentioned
3 earlier. I mean, I did see that.

4 And I told the investigators last summer that while we were on -- and I'm not sure
5 if I mentioned this to you the other day or not, but while we were on the lawn watching
6 President Trump's actual speech and the events, you know, that were there with all of
7 speakers, during President Trump's speech, towards the beginning of it, there was a
8 group that paraded across, I guess, that lawn there in front of the -- we were pretty close
9 to the Washington Monument was where we were watching from. And there was a
10 group that made their way down the hill, and they came in like right behind us, and they
11 were calling -- they had like a megaphone thing, and they were calling to join them, that
12 they were going to the Capitol to invade it or -- I don't know what the word was that they
13 used.

14 But it was just almost like one of those things that was like, you know, almost like
15 a dream or like surreal. You know, it was like -- because they moved. I mean, they just
16 moved. They were calling, they moved, they kept moving. And it was one of those
17 things where you were kind of were like, did that just really happen, you know what I
18 mean. You know, it was like, who the heck would be doing this?

19 And so it was something that you really didn't pay attention to. But then, I
20 mean, you know, the terrible things that did happen later that afternoon, you know, at
21 that point, you know, you stop and -- I don't know -- I mean, I guess you could say you
22 really understand the phrase a lot better of "see something, say something," you know.
23 But, I mean, again, I don't really know what we would have done, you know, there that
24 day to -- or who we would have gone to or who we could have said anything to.

25 Q You said this group of guys was wearing helmets. Do you remember how

1 else they were dressed?

2 A I want to say maybe some type of fatigues. I don't, you know, really want
3 to try to say specifically because, again, I just -- I don't know. It does seem, you know,
4 like, again, it might have been more of a fatigue outfit of some sort, but if it was camo, if
5 it was all black, if it was desert tan, you know, I can't remember.

6 Q Do you remember how big of a group it was?

7 A I didn't really pay attention to them.

8 Q I'm sorry. I talked over you at the end. What was the last part?

9 A I just said I really -- you know, I really didn't pay much attention, you know,
10 to them. You know, I mean, I kind of am a crowd watcher, whatever. You know, so, I
11 mean, of course, I was, you know, looking at all the things. And like I said, there
12 were -- you know, you have my videos and things. And last summer, I tried to go
13 through some of the videos that I told the investigators that came to see, if I captured any
14 of that information. I didn't notice anything.

15 I'm sure that you've probably listened -- or, you know, watched and listened to the
16 videos and things. So I don't know if there's anything you know, maybe that might help
17 you with that, you know, portion there. But as far as I could tell, I didn't have anything
18 about that on video, but it was something that happened, I mean, you know, very close to
19 us.

1

2 [11:04 a.m.]

3

BY [REDACTED]

4

Q Do you remember about how big the group was?

5

A I would say that there was probably about -- there was probably about

6

maybe 8 to maybe 12 guys. And I would say younger, you know, early 20s maybe.

7

Q At least to the best you could tell, all guys, no women?

8

A Yeah. Yeah. To the -- to the best -- I mean, you know, again -- it

9

wasn't -- you know, I mean, I was watching the speech and I did, you know what I mean,

10

from, like I said, they kind of came from behind us, but from the side and they had this

11

megaphone, but, I mean, there was a lot of noise and, I mean, you couldn't -- and, like I

12

said, they weren't really, you know, I mean, my exact focus and everything at that time,

13

but -- and that's what I'm saying.

14

Even then the people -- you know, it kind of got, I guess, mixed in with the group

15

and people around started saying, you know, are they saying that they're going to go to

16

the Capitol and attack the Capitol? And all this stuff, you know. I mean, you know, so

17

you kind of started getting any extra information. And I -- I mean, I do recall, like I

18

said -- I mean, I was aware that it happened, but I didn't pay much -- I didn't really give

19

them much mind.

20

Q And what race, if you remember, were the people?

21

A White for sure. And if there was any others, again, I really didn't -- I mean,

22

I can say, yes, I mean, I definitely noticed, you know, White, Caucasian.

23

Q All right. And I'm not trying to pin you down to it, but you remember them

24

saying something about invading or doing something to the Capitol? It stood out to you

25

as strange.

1 A Yes. I mean, just basically, again, you know, there was -- the little guy in
2 front and I say little -- I mean, you know, he was probably -- I just want to say, my guess, a
3 young kid. And I say kid because I'm a little bit older, but early to maybe mid-20s having
4 the megaphone and something along the lines of yes, I mean, come on, join us let's go.
5 You know what I mean? It's time to go to the Capitol and, you know, whatever.

6 And, again, I -- I don't want to be exactly quoted on that, but that was the gist
7 of -- of what, you know, what he was saying.

8 Now, I remember looking at -- I think he had kind of, like, long, dark scraggily hair.
9 And that's just basically, you know, what I -- what I kind of remember about him.

10 Q Okay. Fair enough.

11 One last logistical question on bus tour stuff and then I'm going to ask [REDACTED] to ask
12 some questions.

13 You mentioned the South Carolina bus and a Georgia bus. Did the tour pick up
14 more buses along the way? Were there stops? Tell us just what you remember in
15 terms of -- just the number of people, number of buses if that increased as you left
16 Atlanta and headed towards D.C.?

17 A Yes. So -- so once we -- once we left Atlanta that morning, the plan was to
18 travel to South Carolina and meet up with another group of buses and, again, at this
19 time -- I mean, I know that there was a specific number again, and roughly another four
20 or five buses maybe.

21 And maybe Columbia, South Carolina, I'm not sure. That is -- that is one of the
22 videos that I sent you the link to. And so we met -- we met that group there and, yes.
23 And then we joined -- and we kept -- and then we moved on to D.C. And, you know, I
24 mean, we made -- obviously, we had to stop a couple of times I guess for gas. And
25 maybe it was restroom stop, and we did -- we did stop as well in the evening of that day

1 that we left, I guess, the 4th there.

2 We stopped at a restaurant. I can't remember -- some type of buffet style food,
3 and we ate dinner that night. I don't think that was included. I think we had to pay for
4 that ourselves if we wanted it, but we did make that stop also.

5 Q So did you travel into Washington, D.C. on January 4th?

6 A No. No. No, because that was the 5th. I'm sorry. That was the 5th. I
7 just wanted to try to make sure, but no, not the 4th. We got there -- I guess we got to
8 the campground and stuff -- it was definitely later in the evening, so no. I mean, you
9 know, no. Not on the 4th, no.

10 Q Okay. Great. We've been going for about an hour. Are you still okay?

11 A If I could just take a sip of water.

12 Q Oh, you can drink water whenever you like. You don't have to -- we can
13 pause if you need to stretch your legs, but you don't have to, you know, go without.

14 A Mouth is getting a little dry. I'm good. Thank you.

15 Q Understood. All right. I'm going to turn it over to [REDACTED] who's going to
16 talk to you about the tour that you took on January 5th.

17 A Okay.

18 BY [REDACTED]

19 Q Thanks, [REDACTED]

20 And I want to echo what [REDACTED] said, Mr. Hallgren. We appreciate how
21 responsive and helpful you've been so far. And if you need a break at any point, please
22 just let us know. We're happy to accommodate that.

23 A Okay.

24 Q I want to talk to you a little bit about the tour you took at the Capitol
25 complex on the 5th. Can you talk to me just from the outset of how you learned about

1 the tour to begin with? When did you learn it was going to happen? How did you get
2 involved with it?

3 A Like I said, basically, I mean, it was -- again, first -- first knowledge
4 of -- knowledge of everything would've come basically through the regular news media
5 that this event was going to happen. And then, you know, I mean, again, that it was -- it
6 was supposed to be, you know, a big gathering.

7 So I wanted to be there, you know what I mean, to -- to support, you know what I
8 mean, my feelings and everything. So like I said, I -- I happened to come across an ad.
9 I believe it was from Facebook where I found the -- found the tour, found the trip going.
10 And as I said, you know what I mean, I had thoughts of how am I going to get there. So
11 it was -- it was -- it was convenient. I mean, it was, you know, like the best thing, you
12 know, that could, you know -- I didn't have to worry about going into the airport. I
13 didn't have to worry about driving. I didn't have to worry about --

14 Q If I could interrupt quickly. I just want to clarify, I said tour, I should have
15 been clearer, the tour you took of the Capitol complex on January 5th, the day before --

16 A I'm sorry. I'm sorry. So after -- again, so after we left Atlanta and we
17 were placed in our groups, and so there was -- there was a family that was on the bus
18 that I was on and they knew -- and, again, I do have the name of the Congressman now
19 here because I heard [REDACTED] mention it a while ago, but Loudermilk, Congressman
20 Loudermilk.

21 Q Representative Barry Loudermilk, does that sound right?

22 A Yes. Okay. So I guess he was the Representative from this family's district
23 and they you know, knew, him or made some preparations to be able to take a tour of
24 the Capitol on the 5th. So like I said, this was prearranged between -- I guess between
25 them and Congressman Loudermilk and this family. And when they got on the bus, the

1 family had mentioned it and, you know, they had said that they could probably -- again, I
2 don't know if this was agreed upon by the Congressman, I don't want to say, but -- what
3 kind of -- hey, we can probably bring a few extra people if anybody wants to go, you
4 know, wants to go to this.

5 And I had -- I had said that I did. And so the next morning came around, again, it
6 was -- it was -- it was an up and go. And, I mean, I almost didn't make it, but, again, it
7 was -- it was something that I -- I wanted to do. I wanted to go and just see the Capitol
8 building and those things.

9 As I mentioned to you all earlier, I mean, it was great to take that tour and also, I
10 mean, I bought souvenirs in the gift shop and those type of things, but that's how that
11 was organized. And like I said, we took the subway down -- trying to think how many of
12 us that there was. I'm going to say probably about eight or nine, I guess.

13 Q Okay.

14 A That might be on the high end, but, I mean, I could probably count
15 everybody up in my head if you gave me a second, but --

16 Q I'll show you a picture in just a second and maybe we can talk through that
17 together. But I want to go back briefly, do you know how that family knew
18 Representative Loudermilk other than they were from his district?

19 A I don't. And like I said, that's -- that's -- that's kind of a guess. I think that
20 that's how I heard it was that they were from his -- from him district. That's basically all
21 I know.

22 Q Okay. And I'm going to pull up -- this is exhibit 4, and it's a photo from the
23 tour. I'm going to show you a couple of photos and I'll warn you in advance and
24 apologize, these are photos of a photo so the quality is not great.

25 But this is a picture of the group. Now you're not in this particular photo, you're

1 just out of frame, but is this -- can you identify within this group who were in the initial
2 family that had the connections to Representative Loudermilk? Do you recognize those
3 folks here? I can zoom in if you need me to.

4 A No. I -- other than I think possibly the little boy.

5 Q Okay.

6 A From the family that knew the Congressman.

7 Q Okay. So were the rest of these people folks like you who were on the bus
8 and heard the family offer to let people join them on the tour?

9 A Yes.

10 Q Okay. And how many people do you think were in the family to begin with
11 before they widened the invitation?

12 A Four.

13 Q Four. Okay. Thank you.

14 And then this isn't a great picture, we can look at a better one if we need to, but
15 the woman with her back to the camera on the left side of the screen, do you remember
16 who she was?

17 A I don't. And I'm really not even sure she was with us. I don't know. Is
18 that -- am I allowed to guess?

19 Q Well, give me one second.

20 A Sure.

21 Q Let me see if we can pull up exhibit 5 here. This is a better photo of her, I
22 think. And, again, these are photos of a photo, so the quality isn't great, but do you
23 recognize her now? It looked to me like she was leading the group through the Capitol
24 complex for a lot of it?

25 A Yes. That's what I was going to say who I thought she may have been, but

1 I'm a -- I'm a little bit clearer now. I believe that that's Congressman Loudermilk's wife, I
2 think --

3 Q Okay.

4 A -- was who --

5 Q Okay. That makes sense. Thank you.

6 And did you know in advance the tour would involve Representative Loudermilk
7 and his wife, or was it billed as something just Representative Loudermilk?

8 A Honestly, like, until we got there, I mean, I wasn't really sure exactly, you
9 know -- I just knew that there was -- yeah, I didn't know if we were going to be going into
10 the -- actually, even where we were going, just to some of it -- as it was, you know -- as
11 you mentioned how the Capitol complex, I guess.

12 Q Right.

13 A This particular building and I didn't know if it was going to be a guided tour
14 or if it was something where we would just do, you know what I mean, do a -- I didn't
15 know how it was going to work, I guess.

16 Q Okay. That makes sense. Thank you. I just want to walk you through
17 now some of the details of that day, and I'll show you some photos along the way. But it
18 looks to us like you arrived around 11:00 a.m. Does that sound about right?

19 A Probably.

20 Q Sometime before lunch?

21 A I think -- I think so, yes, because we did go to the cafeteria, I guess, pretty
22 close to when we got in there.

23 Q Okay. And do you remember -- you had to go through security, I think,
24 probably to get into the complex, right?

25 A Yes.

1 Q Okay. Did you have anyone meet you there to help you get through
2 security?

3 A I'm pretty sure -- I don't remember exactly, but I think maybe either the
4 Congressman or his wife came in and met us to escort us, I guess.

5 Q Right. And do you remember if you had to show anyone a photo ID like a
6 driver's license to get in or did they let you through without that?

7 A I can't really say. I don't remember exactly. I don't think, but I don't
8 know. We could've, I don't know.

9 Q All right. Thank you.
10 And do you remember -- did you get a little paper badge with a clip or anything?
11 Did you have to wear any form of ID or guest credential?

12 A Again, I'm not -- it wasn't like a, you know, something that would've said
13 guest. I can't remember if maybe we got, you know, a little -- little stick-on thing or not,
14 but it wasn't like an elaborate placard or anything like that, you know, that
15 said -- something that we wore around our neck or pinned on. If we got a sticker or
16 something like that, again, I'm sorry. I don't remember.

17 Q Okay. Thank you.

18 You come into the complex and go through security. Do you remember where
19 you went next? Did you go to his office first? Did you go somewhere else?

20 A We -- we went to the office.

21 Q Okay. And do you remember what you did there once you got to his
22 office?

23 A I think it was just kind of, like -- again, like a brief conversation about some
24 different things, I mean -- I mean, we talked about different paintings, you know, that
25 were in the office and just generally kind of small talk, I guess. Maybe we waited

1 there -- I can't remember if we waited there for the Congressman or to get a better game
2 plan together.

3 I want to say maybe we waited on the Congressman because it seems like we
4 were there for a minute and then after we left -- I mean, I know that pretty soon after we
5 got in the building, we did, like I said, we went to the cafeteria.

6 Q Right. Okay. So you did see the Congressman in his office at some point?
7 Whether he was there when you arrived or not, he came at some point?

8 A Yes. Yes.

9 Q Okay. And did you all talk with him about January 6th at all while you were
10 there?

11 A There was conversation about it, you know, again, myself personally or
12 particularly. I don't -- I don't -- it may seem hard to believe, but I don't really initiate a
13 lot of conversation. Again, if I'm asked questions, sometimes you got to tell me to be
14 quiet because I can -- I don't -- I don't, you know, like I said, I don't initiate a lot of
15 conversation.

16 Q Right. That makes sense.

17 Do you remember what people said about the 6th when they were talking with
18 the Congressman?

19 A I think it was, basically, had to do with questions about, you know -- I guess,
20 Congress was meeting to, I believe, do the electors that day or whatever and so, I mean, it
21 was conversation related to that, you know I mean? Because it was all the talk about,
22 you know, that maybe Vice President Pence was not going to, you know, certify or
23 whatever it's called.

24 So it was just questions pretty much, you know, related to that. Do you think
25 that, you know, that he'll actually do that? Do you think that, you know, anybody will

1 contest anything? And, again, I'm kind of -- I'm kind of ad libbing to just -- it was along
2 those lines, but exactly how things were phrased or what was exactly said or the exact
3 context, I mean, again, I was there and, I mean, you know, I did hear kind of -- I was
4 listening, but I don't recall exactly.

5 Q So to summarize and you tell me if this is wrong, it sounds like most of that
6 conversation about the 6th with the Congressman was procedural. It was about what
7 Congress was going to do on the 6th with certifying the election or what the Vice
8 President was going to do?

9 A Yeah, yeah, basically. And, again, there may have been some other topics
10 or areas -- could have been anything. I don't think -- there may have been other things,
11 but I don't have any idea. So just to say, I mean, I don't know if that was the exact only
12 conversation.

13 Q Okay.

14 A I think that that was probably the main, you know, context and conversation
15 and information that wanted to be received and heard, but there might have been other
16 questions, you know.

17 Q Right. Do you remember anything specifically about the rally on the 6th?

18 A On the --

1

2

BY 

3

4

Q On the 6th. Do you remember talking about the rally at all with the Congressman? This is the day before, obviously. This is on the 5th.

5

6

A I don't remember, no. I don't remember. And I want to say that I don't think that there was any talk of it. There could have been, but I don't remember.

7

Q Okay. Thank you.

8

9

10

So you mentioned you took a picture. I know we talked about not being able to find the picture earlier, but you took a picture in his office. Is that correct? Or you think you remember taking a picture?

11

A I had -- I had a picture taken of me.

12

Q Okay.

13

14

A And I may have taken pictures myself, too, but, like I said, I cannot find any of those. But yes, I mean, yes, there was a picture of me taken in the office.

15

16

Q And where were you when the picture was taken? Were you at a desk? Were you in the waiting room? Somewhere else?

17

18

A Well, the one that, like, I'm saying that I know for sure is in my head is I'm at -- I'm at a desk.

19

Q Okay.

20

21

A And, you know, there might have been others taken where somebody else was -- and I might have been in a photo, but that one was particularly taken of me.

22

Q Okay. Thank you.

23

24

25

So it sounds like you went to his office and you spent a little bit of time there. He joins you at some point or he was there when you arrived. And then you said you headed to lunch next. Is that right?

1 A I -- I think so. I believe so. You know, I mean, we just -- we headed out
2 and down the corridors and things and different things were kind of pointed out, but I
3 think that was basically where we headed.

4 Q What sorts of things were pointed out?

5 A You know, just different offices and, you know -- I don't know -- I think
6 history about, you know what I mean, whose office that -- a particular office may have
7 been. Just things that I really don't remember, but, again, just general information. I
8 mean, nothing of any real relevance, but -- but -- but history, you know, to -- to the
9 Capitol. You know what I mean?

10 This is, you know, what may have happened here or, you know what I mean,
11 certain sign -- I remember something about certain signs that were placed on certain
12 doors, like -- again, nothing of relevance at all of anything to this -- but, again, just the
13 history of, yeah I mean, somebody had this office in, you know, 1800 or something like
14 that, or you know what I mean, or, you know, early 1900s and, you know what I mean,
15 this is their office or whatever, or whatever the -- whenever the building was actually
16 built. I mean, this was somebody's offices way back then.

17 Q And this was Congressman Loudermilk pointing things out along the way?

18 A I think it was his wife. You know, that's what I was going to say a moment
19 ago. We may have actually met him at lunch or he may have met up with us at lunch,
20 and so he might not have been there initially -- I mean, we were -- we were in his office, I
21 think, at a -- at a couple different times. So when we came into the building.

22 So we went to his office, then we went to the cafeteria, and I think that
23 that's -- maybe he joined us at lunch. And then I think maybe we may have went back
24 to his office, I'm not sure, to either, you know, drop some things off or whatever.

25 And then we -- then we -- then we actually really began the tour. We began the

1 tour after lunch. Whether we began it from the actual cafeteria or whether we began it,
2 like I said, maybe we took a short trip back to his office to kind of drop off jackets and
3 coats and things, again, I don't know.

4 And then we -- but we did start the official tour of basically everything where they
5 took us through kind of the different halls and we walked through the different halls.

6 And we -- we did conclude the tour -- I'm sorry. I could have some of these
7 details mixed up.

8 Q Well, I'll tell you what, why don't we move through it together because I've
9 got some photos that might help.

10 A Okay. Okay.

11 Q Let me pull up -- this is exhibit 6, if I can find it.

12 So I'll represent to you this is from surveillance footage. And I can tell you that, I
13 think based on what we've seen, Representative Loudermilk was at the front of this
14 particular group of people. This is towards the tail end of a clip, this screenshot, and
15 you're in the background standing by a door.

16 This is on the way from his office to the cafeteria at about 11:50 just before 11:50
17 a.m. on the 5th. It looks like you're on the phone when the group comes through.

18 A Yes.

19 Q Do you remember who you were speaking with?

20 A Yes. That was my -- my credit card company, I guess. I -- I had a long
21 conversation with them, unfortunately, that day.

22 Q Okay. But nothing related to the 5th or the 6th --

23 A No.

24 Q -- or this tour?

25 A Other than -- other than -- since -- since I was there in Washington, D.C. and

1 my wife was back here in Atlanta, I had tried to establish things so that -- that she had
2 free rein of the credit card while she was here. You know -- I mean, because she was
3 probably going to have to be taking an Uber back and forth to work, we weren't sure
4 what that was going to cost, and just -- I wanted to make sure that she had no problems
5 and there ended up being problems.

6 So that was -- they didn't -- they didn't get her card access correctly or something.
7 And when she tried to call her Uber that morning, she wasn't able to do it. So I just -- I
8 wasn't happy about that and I had to call -- I had to call them and -- I mean, I don't know.
9 It ended up being a long conversation for some reason. I was on the phone for quite a
10 while.

11 Q Okay. Thank you.

12 So you all went to lunch and the Congressman was with you for lunch. Is that
13 correct?

14 A And this is the thing, kind of, about that -- maybe this is why I don't
15 remember anything about -- really about that particular moment, because -- I mean,
16 so -- and that reminds me again with you showing me the photos. So that was helpful.
17 So thank you.

18 Yes. That's why I don't really recall a lot about this time. I was on the phone.
19 So I wasn't really -- I was on the phone with them and, again, I was -- I was pretty
20 distracted at that point. I was -- I was concerned about my wife back here in Atlanta.

21 So -- so from that -- during that point, basically, any time I was on the phone, I
22 wasn't thinking about Washington, D.C. or anything. I was really thinking about trying to
23 make sure that my wife was going to be okay back here by herself.

24 Q I can completely understand that. Thank you.

25 So at some point were you able to get lunch? Did you buy lunch in the cafeteria?

1 A No. I missed lunch and everything because I was on that phone call.

2 Q Okay. Do you remember if you -- you may not have sat with them or eaten
3 with them, but do you remember if you saw the rest of the group together while you
4 were on the phone in the cafeteria?

5 A Yes. Yes. I mean, you know, they -- they pretty much -- I think, at least
6 everybody who was going to eat, I mean, they -- they ate and they -- they found a section
7 of the cafeteria to sit down in and -- and do that.

8 Q All right. And the Congressman and his wife were with the group for that?

9 A At least the Congressman and at that time, I can't remember if his wife was
10 there or not.

11 Q All right. Thank you.

12 So after lunch, you said that's when the tour really seemed to start?

13 A Yeah.

14 Q Okay. So I'm going to show you another exhibit. This is exhibit 7.

15 So I think this was taken shortly after lunch. I can represent to you that this is
16 the hallway next to the cafeteria, and it looks like the group comes out. And I just
17 wanted to ask you here to clarify, this is, I think, a picture of you taking a picture of the
18 stairwell.

19 Do you remember taking this photo?

20 A Not exactly, but, I mean, obviously that appears to be what -- what I'm
21 doing.

22 Q All right. And then in the background, I think we see the
23 Congressman -- and, again, it's a little blurry -- and two other people. Were the two
24 people with him, do you remember if they were part of the family, one man and one
25 woman?

1 A I know that the -- that the gentleman with the -- with the red cap is -- is for
2 sure and, because her back is -- is, you know, turned to me, I mean, I can't definitely say,
3 but, you know, I don't know, again, if I should guess, you know, at some of these things or
4 whatever, but because her back is turned to me, I can't, you know, say for certain.

5 And for the fact that, again, you know, I'd only met these people 24 hours roughly
6 beforehand and I spent no time with them. So I mean, I really didn't know who was who
7 or what, you know. Afterwards -- again, you know, then we spent, I guess, 2 days or
8 whatever together to where I did get to meet some of these people.

9 So it's -- I can say that I know that the gentleman there in the red hat, red cap,
10 was -- was the father of the family for sure.

11 Q Do you remember his name by chance?

12 A No. I mean, if I take a minute, I don't think I could even remember, but not
13 off the top of my head, no.

14 Q Do you remember the names of anyone else who was in that tour group
15 with you on January 5th?

16 And if it's helpful, we can go back to exhibit 5. This is the photo or -- excuse
17 me -- exhibit 4. This is the photo of most of the group.

18 A Names, I'm going to say, not really. Like I said, I didn't -- I mean, you know,
19 and probably as you can see from a lot of the photos, I'm not really right up with and so, I
20 mean, I wasn't, like -- I hate to use the word "clique," but for these purposes, you know
21 what I mean, I was -- I was there with a group, but like same time I wasn't --

22 I didn't, you know, everybody you can kind of see -- everybody's -- I think the
23 three ladies there are family, the three ladies that are kind of in the middle of the picture
24 there, they're family.

25 And that's what I said, I could -- I know a little bit more, like, about -- about them,

1 so to speak, than even their names or, again, and that's just from, again, kind of being
2 able to gather that, I mean, yes. We were introduced and things like that on the bus,
3 but to remember their names, I just know that they were family.

4 I think it was the mother and two daughters, if I'm remembering correctly. The
5 gentleman that was there on their right, he was a friend of the family. And I think the
6 guy that was behind him was a friend of the gentleman maybe that was there, but I'm not
7 entirely certain even about all of that.

8 Q Okay. Thank you. Does the name Albert Foley ring a bell?

9 A No.

10 Q Okay. And then there's a man in this photo with a tie on that appears to be
11 with the group. Was he part of the tour or did he just appear in the same photo here?

12 A I think he just appears in the photo, because he doesn't -- I mean, that was
13 nobody -- that was nobody from our group. I mean, you know, again, we were in, you
14 know, blue jeans.

15 Q It was Representative Loudermilk and his wife leading the tour; there were
16 no staff from his office on the tour as well that you recall?

17 A No. No. I don't know.

18 Q Okay. Thank you.

19 I'm going to go back to exhibit 7 briefly, the photo we just looked at, and I would
20 just ask that if you -- when you get the chance to, please, look back and see if you do
21 happen to have this photo, because that would be helpful. I believe it's of a staircase at
22 the bottom of one of the buildings.

23 A Do you know -- do you know, like, what was on the staircase? Again, that
24 seems -- maybe a picture at the top of the landing or something that I might have been
25 just taking a photograph of? I'm trying to remember, again, you know, again, until you

1 showed me this -- from that -- like I said, I didn't remember this until you showed me this
2 at all.

3 My thought would be that I would've taken pictures there in the Capitol building
4 and, like I said, I know for certain that there was a picture taken of me in Congressman
5 Loudermilk's office with me sitting at a desk. Where any of those photos or what
6 happened -- you know, as I was saying, my phone was kind of messed up at the time.

7 Because when I was trying to think -- I knew that that picture was out there of -- of
8 me at the desk. I mean, I know that that was taken and I'm trying to think what
9 happened to this picture.

10 And -- the only thing I could think is that -- and I'm thinking along this same
11 time -- I think I took pictures -- I mean, I know I'm in the Capitol, I would've taken pictures
12 of other, you know, of other things while I was in there. What happened to all these
13 pictures?

14 And the only thing I can think of -- I don't have them. The only thing that I can
15 think is that maybe the phone, again, because of its -- its limited operating and
16 everything, having a full memory, maybe it wasn't -- I don't know.

17 I mean, because I was able to take videos the following day and stuff; I just -- I
18 don't honestly have an explanation for that of what happened to those pictures, you
19 know, from there because, again, I would -- I would guess, highly suspect that, again, this
20 was a tour that I was taking of the Capitol building. I know that there would have been
21 things in there that I would've wanted to take pictures of, but I don't have a single one.

22 Q All right. Well, thank you. Maybe we can revisit that at the end. It may
23 come up again.

24 In the background here, you see Representative Loudermilk speaking with those
25 two people on the tour and they appear to be speaking into a phone the gentleman has

1 held up on speaker phone.

2 Do you remember or do you know who they spoke to?

3 A No.

4 Q Okay. So I'm going to move to exhibit 8. This is another photo. So this
5 is one you're not in. This is shortly after that last photo was taken. It looks like the
6 rest of the group had left one building in the Capitol complex and moved into another.
7 This is in the basement of the Cannon House Office Building at the entrance to a tunnel
8 that leads to the Capitol building. And it looks like you can see here the group was
9 taking photos of the tunnel near the security checkpoint.

10 Do you remember why the group stopped here? I think you came into this area
11 just a few seconds later.

12 A So that is definitely where the tour concluded, and Congressman Loudermilk
13 was on his way to the Capitol, and that's why -- that was -- I don't know if you mentioned
14 the time or not. I want to say that it was maybe right around before -- shortly before
15 1:00 p.m., I think.

16 Q So I think -- we'll get to this in a second. There are two tunnels into the
17 Capitol, and I think you all stopped at both. So this may have been the first of two.

18 A Okay.

19 Q Do you remember walking around in -- it's called a small Rotunda? There
20 were cases out, display cases.

21 A Yes. Yes.

22 Q Okay. I think that was shortly after this, but do you recall stopping in a
23 tunnel before Representative Loudermilk departed, not the last stop on the tour, but
24 before the last stop?

25 A I was stopping in a tunnel -- could you -- I mean, are you talking like where

1 the tour definitely concluded?

2 Q No. I'm sorry. As a stop on the tour along the tour route.

3 Let me move -- this might help. Exhibit 9. This is right in the same area; it's just
4 a few feet away, a different angle. And this is taken a few minutes later. You all walk
5 into the small Rotunda and then you leave the area again. And I think on the left, you
6 can see you're taking a photo of -- the space we just saw with the x-ray machines, the
7 entrance to that tunnel.

8 Do you remember taking this photograph?

9 A Again, no, I don't remember taking that. Obviously, I'm taking a photo and,
10 you know, again, to that, like I said, I -- I would and have been, you know what I mean,
11 curious as to why, you know -- why I haven't been able to find any photos from inside the
12 Capitol.

13 Because, you know what I mean, again, I'm sure that as I am there would have
14 been taking pictures of different points of interest.

15 Q Right. I understand. And it looks like, based on this photo, there's a
16 gentleman with a water bottle in his hand gesturing in your direction. I believe it's a
17 Member of Congress based on the pin on his lapel and based on the video at the time, it
18 looks like the two of you have a very brief exchange. He says something to you and you
19 respond.

20 Do you remember that at all?

21 A Not at all, no. I don't even know who -- I mean, I don't know who he is and,
22 you know -- yeah. I don't -- I don't know. I mean, I couldn't even say if I'm taking a
23 picture of him or something else there. Again, I'm not really sure where that -- where
24 that is in the -- in the complex or whatever or what that's -- what that's around or, again,
25 other than it's just maybe me thinking that oh, this is a Congressman.

1 Do you know who that is?

2 Q I don't. I don't. And I believe, just to make it clear, he entered after the
3 photo -- after you started taking the photo. I don't believe the photo was of him; it was
4 of the tunnel into the Capitol.

5 A Okay.

6 Q Okay. Well, after you all left that small Rotunda area, do you remember
7 where you went? Was the gift shop where you went next?

8 A This is really hard, to be honest, I mean, to answer -- answer those type of
9 things, you know what I mean, because, again -- this is very hard to recollect for me, you
10 know. And, you know, again, I'm not denying that I was there or, you know what I
11 mean, anything like that or -- or took this tour. That was a long time ago for me any
12 ways, a year, year and a half ago, whatever it was.

13 Q Absolutely. Understand. I know it's been over a year now. It's hard to
14 remember these sorts of details, and you've been extremely helpful so far. So we really
15 do appreciate it.

16 But did you remember going to a gift store at any point during the tour? I think
17 you mentioned earlier that you bought some souvenirs.

18 A Yes.

19 Q Okay. And do you remember what you purchased while you were there?

20 A I know I purchased like a blanket, like an Afghan blanket, and I want to say
21 maybe it was, like, maybe of the American flag or something like that that was, like, a
22 blanket. And I'm not a 100 percent certain, but I know that -- I don't do it as much any
23 more, but, again, from a lot of my trips, I usually, you know, collect like or I'll buy a coffee
24 mug from someplace.

25 So I would guess that -- because I know that I bought -- I bought the blanket for

1 my wife and I wanted to have something for myself.

2 So I would say that it was the coffee mug, but, again, to be honest, I think I
3 actually just came across that bag of gifts the other night up in the -- up in the -- the back
4 of our closet.

5 And so, you know, that's what I'm saying, like, with this stuff. I mean, that bag
6 hasn't even been opened. The blanket's sitting in there. I'm sure the receipt's
7 probably in the bottom of the bag.

8 Q Right. Like a lot of souvenirs, I think.

9 A Right. And that's why I don't buy a whole lot of them anymore. I mean,
10 I've got tons of them from all over the place that are still in wrapping. I don't have them
11 displayed like I used to do and things.

12 So I don't buy them that much anymore. But I'm pretty certain that it was
13 probably a coffee mug that I probably bought for myself and maybe a T-shirt. I think I
14 bought my wife a T-shirt also that says -- that said the 100 -- I can't remember if it was the
15 116th or the 117th Congress that I bought her. I think I bought her -- I think I bought her
16 a T-shirt.

17 Q All right. And did Representative Loudermilk go into the gift shop with
18 you?

19 A I think so. I think, you know, that he introduced -- because I think it was -- I
20 think we kind of, like, had to be kind of escorted in there, if I remember right. Like, I
21 mean, like, I don't think -- because there was kind of, like, people there that did kind of
22 look at us, I think, funny. I'm kind of maybe -- maybe -- I don't want to say exaggerating,
23 but maybe I'm imagining that, you know, that they were looking -- you know, like, we
24 were out of place.

25 Like -- like, they had -- and so I think that him or his wife and/or maybe both of

1 them, I don't know, did kind of say that, you know, that this group -- we're taking this
2 group, you know, on a tour. So I mean, they're okay, basically, like that, something like
3 that.

4 Q All right. Was he with you for the whole tour? I should've asked this
5 earlier, or did he break off at some point and then rejoin the group?

6 That's what it looks like from some of these photos that his wife was with the
7 majority of the group throughout the tour, but that he went with those two folks we saw
8 on the phone with him earlier for a brief period of time before he rejoined the group.

9 Do you recall that?

10 A Not really. I mean, you know, I don't. I'm not going to say that that didn't
11 happen or it did. I just -- I couldn't answer that at all.

12 Q All right. So after you visited the gift store, I'm going to pull up -- this is
13 exhibit 10, and I think this is what you were talking about earlier and please, correct me if
14 I'm wrong, but this is the other tunnel we just discussed and I think this is where
15 Representative Loudermilk and your group parted ways.

16 Here's a picture of a picture of you all taking photos of the tunnel. Do you
17 remember this?

18 A Yes. That was -- and that was photos of him, like, on the little -- I can't
19 remember if it was a golf cart or if it's actually like one of those old coal cars that runs on
20 a set of tracks or something, but anyways, he got like into this transportation vehicle or
21 whatever. I can't remember.

22 I don't know if it was a golf cart or, like I said -- it seemed, like, it ran on a set of
23 tracks. Do I have that right or am I --

24 Q That's right. There's something similar to what you described in this area.
25 So this is a picture of him leaving for the Capitol, Representative Loudermilk --

1 A Right. That was the end of things and that's what we were all doing there,
2 I'm sure, is taking -- you know, taking the last photos of him that, you know, we would
3 have been able to capture.

4 Q All right. And then it looks like after this you all returned to his office and
5 were there for a little while before you left the building. Do you remember what you all
6 did in his office after the tour had finished?

7 A I think it was more, again, probably just like additional, you know, questions
8 and answers of anything, you know, that we might've seen from earlier on in the day, if
9 we had any questions or, you know, additional information, you know, that the
10 Congressman's wife wanted to share with us or anything like that.

11 Q All right. Thank you.

12 And then I think the last photo I have to show you here -- this is exhibit 11. This
13 was taken on the tour group's way out of the building. I think at the end of the tour, so
14 this is around 2:20 p.m. on the 5th. And it looks like the group exits the building and
15 then you have about a 90 second exchange with a Capitol police officer.

16 Do you remember what this was about?

17 A Yeah.

18 Q Okay. Go ahead.

19 A Yes. I was getting ready or at this time, I think, I had -- I had just put my
20 sweatshirt -- you can see the red sweatshirt. So when I was putting that on, I took my
21 mask off so that the sweatshirt was kind of tight as it comes around my big head and I
22 didn't want it to rip with the mask and everything, rip my ears off, so I took the mask off
23 and then I -- I put my jacket on and things, and I had not put my mask back on and that's
24 what --

25 And actually, actually, when I was on the phone during the day, this -- yeah, I think

1 it was the same officer -- I don't know if he saw me or if somebody called and
2 said -- because when I was on the phone, I didn't have the mask on either. I had it on to
3 begin with, I think, but as I was talking and getting winded, like I said, that was a long
4 phone call, I took the mask down. And so I think that somebody called and reported
5 that I didn't have my mask on.

6 And so, because he had spoken to me earlier in the day on that, then when at the
7 end of the day when I was leaving and, like I said, brought the mask down, that was his
8 thing. He kind of got excited about that.

9 Q What do you mean he got excited about it?

10 A He was upset about it. You know, he pointed over to me and then he -- I
11 mean, he called me and told me, he said, hey, he said, you know, what are you doing?
12 Why don't you have a mask on?

13 And then he -- I can't remember if he told me to come to him or if he said wait
14 there or whatever. And he -- he came over and I don't remember exactly what all he
15 was saying, but he was -- he was upset.

16 Oh, he did say, you know, didn't I speak to you about this earlier in the day? And
17 you know what I mean, I had to say yes. But that's -- yeah. He was -- he wasn't happy,
18 I guess, that he had to talk to me twice in the same day about the same thing.

19 Q All right. Thank you.

20 So other than it sounds like those two interactions with that particular police
21 officer, did you have any other interactions with law enforcement while you were inside
22 the Capitol complex on the 5th?

23 A No.

24 Q Thank you. So you all leave the complex, did Mrs. Loudermilk go with you?

25 A She escorted us, yes, outside the building and I think got us maybe pointed

1 in -- in a direction that -- that we were going to be heading -- headed.

2 Q All right. I'm going to turn it back over to [REDACTED] in just a minute, but I have
3 a few follow-up questions about the tour in general.

4 A Okay.

5 Q I know you said you generally stood back from the group and didn't
6 necessarily initiate conversation, but do you remember having any conversations with
7 Representative Loudermilk yourself?

8 A Not exactly, I mean, and I don't know what, you know, again, what -- just
9 knowing myself, possibly saying something, you know, that -- something along the lines, I
10 appreciate his service and thank you for, you know -- I'm sure I did say that.

11 I'm sure I did say thank you for having us on this tour today, yeah, but anything,
12 you know, more elaborate than basically that, no. No. Not to my recollection, and I
13 couldn't really see myself going into anything like that.

14 Q And have you had any interaction with him, the Congressman or his wife or
15 his office, since the tour on the 5th?

16 A No.

17 Q And then did you -- I know we talked about what you posted on Facebook
18 and the issues with finding some of the photos you took in the Capitol complex on your
19 phone. Do you remember sharing the photos you took with anyone else?

20 A No, I mean, not anybody directly. If they may have been shared to
21 Facebook at the time, that's a possibility, but, I mean, you know, I'll just say, you know,
22 those pictures to me are a real mystery.

23 You know, I kind of wish -- I definitely wish that, you know, that I had those.
24 Again, as I mentioned, I don't really look at pictures, but maybe some day if I, you know,
25 whatever, whether it's 5, 10, next year, whatever, decide to look at it, I would -- you

1 know, I would like to have that for the -- for the memorabilia purposes, but, you know, I
2 don't know if -- if they got saved in a folder and, again, I wouldn't know how to do that, so
3 I don't think that that's the case. I just don't know what happened to them.

4 Q So I know you said it's possible you posted some on Facebook and you
5 mentioned earlier that you used Telegram sometimes. Is it possible you would've
6 posted some in Telegram chat?

7 A I don't think so.

8 Q Okay. Before you visited the Capitol, had you ever visited a website called
9 the Donald.win? Does that sound familiar?

10 A Yes.

11 Q Okay. Can you tell me when you visited that, roughly?

12 A Okay. And I guess maybe I should -- maybe I should make more clear.
13 Because you asked before going into the Capitol, correct? That was the question?

14 Q Have you ever visited the Donald.win, how about that?

15 A Okay. So have I ever? Yes. And I was -- I was -- only I was informed of
16 that website by one of the -- one of the members that was on the group with us. And,
17 you know, she said, you know, hey, if, you know, this is -- this is a site that provides a lot
18 of information on current political events and things.

19 So I know that I did search it. There was no interaction, you know, with me at all.
20 I don't even know if I was able, either -- actually able to get to the site. I don't
21 recollect -- I do remember -- I do know specifically that that was the name of a site that
22 was -- that was given to me on that trip by one of the other members in our group, and I
23 do know that I did try to go to it, but if I was able to access it or -- and that was, I believe,
24 probably -- like, I'm saying -- probably that night after the Capitol tours.

25 So that's why I wanted to ask the question, before or after, because I don't think

1 prior to that -- I mean, I had never heard of -- I had never heard of the website or
2 whatever. So, I mean, it was just -- it was just we were talking about different, you
3 know, social medias and platforms and websites to go -- to go and get, you know, other
4 information from.

5 And that was -- you know, that was an address that was given to me. And like I
6 said, I did try to access it, again, maybe because -- I don't know. Like I said, I'm glad that
7 I don't have that phone anymore.

8 Q Thank you. That's very helpful.

9 Do you remember -- I know you said she described it as a site that had content
10 about current events. Did she describe anything else about the website, the woman
11 who raised it with you?

12 A No. Just, you know, I mean, again, it was -- it was shared in, you know
13 what I mean, some of the different sites, you know, platforms, YouTube channels, I guess,
14 you know, that you might be able to go to and view and just get information about the
15 current political events in the country.

16 Q Okay. Had you ever visited or have you ever heard about websites on the
17 Capitol tunnels, the Capitol complex, the layout of the Capitol building, or the tunnels in
18 the Capitol?

19 A Have I ever accessed?

20 Q Have you ever accessed or heard about them? I don't know if she
21 mentioned them maybe in relation to the Donald.win.

22 A Oh, well, that wasn't what the Donald.win website was in reference to. I
23 mean, she was just telling me about that. I mean, I am aware of, I mean, of their
24 supposedly and I guess actually being tunnels probably not only underneath the Capitol,
25 but probably under a large part of Washington, D.C.

1 I mean, you know, I have heard that, but I mean, have I accessed any sites to those
2 or ever even seen any pictures, I've -- I've heard of those, yes, and that's been on various
3 different occasions, I mean, you know, from school, you know, from educational
4 purposes, learning about that to, you know, again when we were on the tour, we were
5 kind of in -- part of underground tunnels and, you know, and it was mentioned that, you
6 know what I mean, like, when Congressman Loudermilk left, that this was, you know, an
7 underground access.

8 So, I mean, you know, there was -- I mean, again, there's I guess various points of
9 references that -- yes, I have heard of tunnels, but I've never researched them or anything
10 I guess like that, if that's what you're asking.

11 Q Yes. Understood. Thank you.

12 And I think the last thing I have to ask before I turn it back over to [REDACTED] is, in
13 relation to that, were you aware that some groups and people were trying to gather
14 information about the layout of the Capitol complex ahead of January 6th?

15 A No.

16 Q Okay. All right. Well, thank you very much, Mr. Hallgren. I really
17 appreciate you taking the time to answer all my questions.

18 A Sure.

19 Q You've been really helpful.

20 Let me turn it back over to [REDACTED] and if you have other questions, please feel
21 free to follow up on this.

22 BY [REDACTED]

23 Q No. I think that about covers things on the tour.

24 Mr. Hallgren, how you doing? We've been going about 2 hours. Are you still
25 good to go for a little more? Do you want to stretch your legs?

1 A Yeah, I'm fine. I would like to try -- I mean, I don't want to rush you all, but
2 I do have a 2 o'clock class today that it's probably about 30 minutes away, and, I mean, if
3 we're here over time, that's just the way it goes, but if there's a possibility that if I wait
4 and we finish this, I can make my class today. So but, like I said I'm not trying to rush
5 this or anything like that --

6 Q Sure. Look, your classes are important. So about what time do you think
7 you need to be done to be able to make it to that class?

8 A I mean, I can probably get there if -- if I leave like no later than 1:30. That
9 would be rushing, but I mean, you know, I can kind of do that, I guess.

10 Q Okay. Well, then, if it's okay with you, we'll just charge ahead. And if
11 we're efficient and I'll be specific with the questions I'm asking, then we could probably
12 finish within an hour if that's okay?

13 A Okay. Great. Thank you.

14 Q Okay. So let's pull up exhibit 12 and I'll just describe to you what this video
15 is before we play it and if you'd like for us to play it for you, then we can, but this is a
16 video that we were -- I think you provided this to us.

17 You produced this video, and it's a video that the time stamp on it, the date and
18 the time, I think, reflects January 5th at about 2:37 in the afternoon?

19 So this would have been following the conclusion of the tour that you've been
20 talking about this morning. And the video shows an event in front of the Supreme Court
21 building.

22 With that having been said, there's nothing specific -- well, let's just actually play
23 maybe the first 30 seconds of the video. It's a longer video. It's like 11 minutes long.
24 We don't have to watch the whole thing.

25 [Video shown.]

1 Q Thanks. That's perfect stopping point.

2 So Mr. Hallgren, did you know about this event that was happening at the
3 Supreme Court ahead of time? Did you happen to wander into it? How did you end
4 up there?

5 A No, we did not know of anything that was going on other than the tour that
6 we took on January 5th and the scheduled protest on January 6th. Those are the only
7 events that we were -- that even in our group that we were aware of.

8 What -- what this was here or whatever -- so, as I said, we wanted to walk into
9 Washington, D.C. We had basically probably at that time, that time of year and
10 everything, we figured probably about another 4 hours of daylight that, you know, we
11 kind of wanted to walk around, again, while we were there in Washington, D.C. and see
12 some of the different things.

13 And so, I mean, that was just something that we -- we happened to stumble
14 across, yes. And so, I mean, I took, you know, videos again, yes.

1

2 [12:04 p.m.]

3

BY [REDACTED]

4 Q Do you remember hearing any specific speakers at this Supreme Court event
5 on January 5th?

6 A No. I mean, I'm sure that there was, and I do believe, you know, that there
7 were probably several different speakers, you know, that came up and, again, said
8 whatever that -- whatever it was they may have said, whatever it was they may have
9 been talking about.

10 As, I guess, you can say from my viewpoint or whatever, it was just part of the
11 whole activity or events that were taking place that weekend. So, again, you know, I
12 mean, I was just -- you know, you do have the Court in the background there. You
13 know, that was there. And then, you know, again, also, yes, the protest or whatever
14 that was going on or demonstration, whatever it might be called, that was happening
15 there as well. So, I mean, I just kind of wanted to photograph that scenario.

16 Q At the start of that video clip, you can hear someone, it seems nearby, selling
17 flag poles. Did you hear that?

18 A Yeah, I did.

19 Q And the purchase of flag poles I think maybe comes up again in one of your
20 Facebook videos from the 6th.

21 Do you remember what kind of poles were being sold? Were they actual flag
22 poles? I mean, were they --

23 A Well, there were -- there were -- I mean, there were -- there were all kinds of
24 various -- I purchased a painter's pole and actually purchased a couple of flags, and that
25 was on January 6th, you know, I mean, that were -- I don't know if you call them vendors

1 or whatever, but people selling, you know, I mean, all along out in front of -- excuse
2 me -- the morning that we arrived there in front of the Washington Monument, so out on
3 the sidewalk there. Geez, probably every 10 or 20 feet there was somebody, you know,
4 I mean, with, you know, like one of those hot dog carts almost with whatever, just flag
5 poles, scarves, stocking caps, or, you know, things, anything from, you know, President
6 Trump slogans to American flags, to, you know, Second Amendment issue type things.
7 And so that stuff was all over.

8 Q And I'm not going to make a secret of it, Mr. Hallgren. If you've seen any of
9 the videos of some of the fighting on the Capitol steps -- not you, just in the media, if
10 you've seen out there on the news some of the videos of people fighting with police
11 officers, there's folks who are using flag poles to fight the police.

12 And so I'm curious if you remember anybody making comments about buying flag
13 poles for defensive or violent purposes.

14 A No. No. And I don't know, again, if this is appropriate for me to just -- I
15 mean, to just make this statement. The only, the only hearings or talk of violence or any
16 type of aggression or anything like that was, like I said, when that little group, you know,
17 paraded or marched down behind us.

18 Q Uh-huh. So you said you were in D.C., just trying to make the best use of
19 daylight on January 5th. Did you go to -- after this event, did you happen to wander into
20 any other speaker, programs, or protest events in D.C.?

21 A It's really hard to say. We may have, but I would think, again, that if we
22 did, I probably shot some video. And, you know, honestly, I think I sent you a half a
23 dozen videos or so, so I think most of those happen to be from January 6th. I just really
24 haven't watched them all, you know, I mean, fully. Like I said, last summer, I kind of
25 skimmed through them to see if I could see that group on January 6th that came behind

1 us, you know, while we were in front of the Washington Monument there on the lawn.

2 Q So -- and I'll just ask more specifically. There was a large event that took
3 place on Freedom Plaza, which is farther down Pennsylvania Avenue towards the White
4 House. It was a big event with a stage and speakers and all that stuff.

5 Do you remember going to that event on the evening of January 5th?

6 A No. You know, again, honestly, I'm not even -- I do recall the video that
7 you showed. Again, now seeing it, I recollect that.

8 I want to say that we tried to get out of -- it even ended up being a little bit earlier
9 than we thought we might. There was a plan and a thought to go down by -- towards
10 the White House. So we may have headed down there and we could have come across
11 something. Honestly, I don't really recollect it. But I do remember, at that point, the
12 group kind of became divided as far as, you know, hey, it's getting dark again. You
13 know, I mean, we really don't want to be in this area after dark. We should -- you know,
14 because we've got to find our way back. We came by subway, I guess that's right, the
15 subway service. So, you know, we've got to find our way back there and then, you
16 know, I mean, to get out of here.

17 So we started moving down that way, and I'm sure that we probably did come
18 across, you know, I mean, demonstrations or protests or events or, you know, again,
19 whatever type of titles that they might have.

20 But, again, if you show me video or something like that, I could maybe -- it would
21 jog my memory or refresh it some, but --

22 Q Yeah. I don't have anything to refresh your memory with. I'm just asking.

23 So it sounds like you don't specifically remember whether you went to additional
24 events?

25 A No. And like I said, there were no plans for any of this stuff. The only

1 plan on January 5th was, like I said, to go to the Rayburn Building, I guess is what it was.
2 And then afterwards, we just kind of, you know, winged it. Like, you know, we wanted
3 to go in -- I guess into Washington, D.C., and just -- I mean, again, I wasn't -- I wasn't -- I
4 was a follower, I guess you could say so. Wherever -- you know, I mean, wherever we
5 went, you know, I mean, basically I was following. I was with them. But, you know, I
6 mean, again, it was Washington, D.C., so, you know, I mean, whatever we may have seen.

7 I had been to Washington, D.C. in the past. I hadn't been there, geez, in
8 probably over 30 years, so, you know, I mean, I was -- again, I was like, yeah, let's, you
9 know, go down, and we'll take some pictures or, you know, I mean, see whatever we see.
10 And there was no knowledge of or preplan after that Rayburn Building tour.

11 Q And then that evening you went back to the campsite with the buses?

12 A Yes, yes.

13 Q All right. Now we can move to January 6th itself, and we can start with
14 exhibit 13. This is a Facebook video that we found on your public profile. I think this
15 actually may be the video that you were referring to earlier from your discussions with
16 law enforcement. It's about 2-plus minutes long, but we will -- I think it probably makes
17 sense just for us to watch it through, and then I'll ask you a couple questions about it.

18 A Okay.

19 [Video shown.]

20

BY [REDACTED]

21 Q All right. So it continues on like that afterwards.

22 The part that I want to ask you about, I think, is the part that you had already
23 discussed earlier this morning, which is the comments at the beginning about the flag
24 pole.

25 First, just want to confirm, in that video, you refer to someone as our fearless

1 leader. Is that Danny Hamilton?

2 A Yes, that would have been -- that would have been who that was.

3 Q And so in the video, he shows you a flag, and specifically the end of the flag
4 pole, and says: It's for a certain person.

5 It's hard to make out in the video, but what was it that he was showing you at the
6 end of that flag pole?

7 A I -- you know, watching the video again there -- again, so this is the first time
8 I've maybe even ever seen that video, and so I was trying to watch. I couldn't -- I
9 couldn't make out -- like I said, I told you what the investigators kind of, you know,
10 mentioned to me or told me and everything last year. But, I mean, even -- I'm kind of
11 realizing watching that video that -- I don't know. I don't think that there was a lot of, I
12 don't know, relation or even truth to what they told me last summer. They told me, you
13 know, different last summer.

14 Like I said, my -- I still think that that was probably -- it didn't look like -- well, you
15 probably gathered that we had just arrived there. I thought it was -- and maybe it was
16 more so when we first got off the bus and everything, but it looked like we were kind of
17 out moving.

18 So like I said, I mean, my whole -- is jumbled and things, but, you know, I tried to
19 pay attention to the flag, as you mentioned. What the investigators, what they told me
20 was that it -- I don't know if they were specific or not either.

21 Q Well, and I'm not -- let me -- sorry for interrupting. I'm not asking you what
22 the investigators told you. I'm asking, based on your recollection and now having
23 watched that video today, do you remember what it was about the end of the flag pole
24 that Danny was showing you that stood out, if anything?

25 A No. And I --

1 Q Because it's hard for me to tell from looking at the video. Was it a
2 sharpened flag pole? Was there an attachment on the end? Because then following
3 that, he sort of acts like he's charging with the flag pole like it's a spear.

4 So from the outside looking in -- again, the video quality is not perfect, but it kind
5 of looks like he's saying, Hey, look at the end of my flag pole. I've done something. It
6 kind of looks like a weapon. That's the impression I get.

7 So I'm curious if you think that that's an incorrect impression or what you
8 remember from the experience that you lived about that flag pole, if you remember at all.

9 A I don't have the best memory, I guess, I would like to probably say first.
10 But watching the video -- and, again, I know you said not what the investigators said,
11 but -- and as you said, looking like he was charging with it as a spear. What I got from
12 watching the video, watching the video, it kind of reminded me of maybe, you know, like
13 seeing the movies -- various movies of, like, on the Revolutionary War, or whatever,
14 things like that with -- you know, you had the militia men running with the American flag
15 like that. That's what that -- that's what went through my mind when I was just
16 watching it.

17 Q And so he says: It's for a certain person.

18 And you respond: That's right, for somebody special.

19 Do you know who he was referring to, the certain person?

20 A I do not. And, I mean, I couldn't even say -- I mean, anybody could be a
21 special person, you know. I mean. I don't think that you could, you know, I mean, say
22 one person. It probably -- I don't know. I really don't.

23 Q Yeah. Well, I mean, I guess I just want to be -- I want to be frank with you,
24 Mr. Hallgren, that if it's the case that at that time that morning you were just making
25 jokes -- whether they're good jokes or bad jokes, that's not part of it -- but you were just

1 making jokes about kind of using a flag pole as a weapon in support of President Trump,
2 that's really kind of all I'm asking about, not trying to say -- and if you remember that,
3 that's fine, and you can tell me why it was a joke or maybe why it wasn't. But that's just
4 kind of -- that's the gist of what I'm asking about. I don't want to beat around the bush.

5 A Right. And the best -- I mean, you know, possibly joke -- you're saying joke.
6 I would call it -- and, again, in all -- stupid talk, you know, just nonsense, is what I
7 would -- how I would probably phrase it.

8 Q Okay.

9 A Because --

10 Q And I appreciate that. And I'm not trying to embarrass you or anything like
11 that. You know, we just have to ask the questions about it. Obviously, all of us are
12 doing this with the benefit of hindsight about what ultimately happened, so -- but I can
13 appreciate you being candid about that.

14 So you stayed -- from your photographs that you shared and from what we've
15 seen posted on Facebook, it seems that you stayed at the rally through the President's
16 speech. Is that right?

17 A Yes.

18 Q Did you leave the rally before he was done speaking?

19 A I went to -- as I told you a moment ago, I went and I purchased the painter's
20 pole and the flags. So I left a little group of us that actually kind of met up. Because
21 even in that video, you could kind of hear the conversation. We were separated. You
22 know, again, there was a lot of people, a lot of commotion, a lot of things going on. Like
23 I said, I was looking around doing a video. So we kind of got separated. It was like,
24 wow, there's a lot of people here, we need to try to get back together so that we can
25 get -- so there was about, I don't know, I guess about six of us or so that met up, and

1 actually -- I don't know. I ended -- well -- no, that was when I went to go and get the
2 flag.

3 So we were there on the grounds in front of the Washington Monument watching
4 all of the earlier previous speeches. Maybe it was before -- because I don't believe I left
5 during President Trump's speech. I mean, I'm pretty certain that I had met back up with
6 the group by that time after I made the purchase of the flags that I bought and the flag
7 pole. But I got separated from them for a minute. When I went down, there's a big
8 area, there's a street, I guess, that kind of -- at the bottom of that hill a little bit that runs
9 down, and that's where they had -- they had the porta johns. And like I said, there was
10 all these vendors again selling flags and flag poles and, again, the various jackets and hats
11 and scarves and all that stuff.

12 So I went down -- I think I was particularly looking for -- you know, I mean, to get
13 some flags to fly, but I was looking at some of the other stuff. And when I came back, I
14 had my kind of direction off or location from where I thought the group was, so I was
15 separated from them for, I don't know, maybe 30 or 45 minutes before I actually found
16 them. And just basically I kind of found -- found a spot where I thought that the group
17 was but, obviously, wasn't and, like I said, just kind of stood there and watched the
18 ceremonies, the protest, whatever it was, going on and, you know, at the same time was
19 trying to scour the crowd to find the people that I was there with.

20 Q And you mentioned a few times buying a painter's pole. Could you just
21 explain what you mean by that?

22 A You know, the extension pole so -- you know, like, you roll the walls with,
23 like a rolling pole, and it comes out. So, I mean, it was like a 25-foot pole. But, I mean,
24 again, I wanted that to be able to -- the flags that I got, to put them up in the air to be
25 seen.

1 Q Got it. So tell me, then, how your group then comes to go from -- well,
2 actually, one last question before we move on from the Ellipse rally.

3 Did you have to go through any security, metal detectors, that kind of thing, to
4 enter where you were watching the President speak?

5 A No.

6 Q Okay. So then tell me how you end up going towards the Capitol after that.
7 Was that part of the plan originally? Were you hearing people? Were you just
8 following the crowd? Explain to us how that happens.

9 A Okay. So when the speech finished up, President Trump's speech, I want to
10 say that -- I don't know if it was necessarily a plan, but I want to say that it was probably
11 the intention to go to the Capitol. I mean, that was -- that was kind of the program
12 of -- and, I mean, not just us. I mean, I think that was the program of the protest, to
13 head that direction.

14 And so that's what I'm saying. I -- and I'll say it was intent because, no, there
15 wasn't a plan. And that was the thing. You know, it was over, you know, these people
16 wanted to go this way. These people wanted to tell this is going to be shorter. So
17 there was no plan. It was chaos. And like I said, me and one of the guys -- the guy that
18 I spent most of the day with, like I said, we almost missed the bus on the way back, we
19 got separated from everybody else. And so I'm not even sure -- we talked down like -- I
20 guess there's a few main streets that go there to the Capitol, but it seemed to be the one
21 that everybody was on, so we were walking. And as we were walking, he was trying to
22 call everybody and saying, you know, hey, hey, hey, you know, where are you at? You
23 know, we're at this building now. We're going to hang out here for a minute. You
24 know, if you're coming, you know, meet back up with us here.

25 So that's how we made our way. Like I said, I want to say that, yes, I mean, you

1 know, the intentions were to move that way, but there wasn't -- we didn't have a good
2 plan.

3 Q Okay. We are going to look now at exhibit 14, which is another video that
4 you provided to us. This one is from January 6th, and I think that from the file
5 information it was recorded sometime a little after 1 o'clock in the afternoon on
6 January 6th, and it's about 3.5 minutes long.

7 I think we do need to watch this one all the way through, but we'll watch it, and
8 then I'll go back and ask some questions about it.

9 So it's exhibit 14.

10 A All right.

11 [Video shown.]

12 The Witness. I can't hear you. Can you hear me?

13 [REDACTED] Sorry. I put my video on mute. Can you hear me now?

14 The Witness. Yes.

15 BY [REDACTED]

16 Q So let me ask, I think, the easy question first based on everything you have
17 said. Did you at any point plan to go into the Capitol Building on January 6th?

18 A No.

19 Q Okay. So I want to just get that out of the way, because I do want to ask
20 you specifically about some of the comments that you made in the video that we just
21 watched.

22 In particular, at one point towards the beginning of the video, you say: There's
23 no escape Pelosi, Schumer, Nadler. We're coming for you.

24 Could you just help us understand what you meant by that?

25 A From watching this video -- and, you know, I mean, as I told you, I haven't

1 watched these things, but a couple of things. So the video particularly, I think a lot of it
2 was caught up in the moment, the passion, the event at the time, at the time, speaking of
3 the time.

4 Sitting back watching it, obviously, not the best choice of words. Maybe not
5 the -- well, not maybe, but not really appropriate and, yeah, kind of embarrassing to sit
6 here and listen to.

7 Q Yeah. So I understand that. I guess I'm curious whether any of the
8 comments you made were influenced by conversations that you were having around
9 even being there on January 6th. Like, in other words, did you understand why people
10 were marching towards the Capitol that morning or that afternoon?

11 A Okay. So do you want me to -- you asked about the comments and then
12 you asked about marching to the Capitol, so --

13 Q Yeah. No, that's fair. You're out lawyering me. So let me just step back
14 and ask you: Did you understand why people were marching to the Capitol that
15 afternoon?

16 A My thought or interpretation, so -- or my understanding, I guess, was
17 basically to show support for President Trump, to make a voice heard that I know for
18 myself -- I'll speak for myself, and I can't speak for all of the other people that were
19 there -- but that we didn't feel that the election results were fair or that -- and so, you
20 know, just wanted to express our grievances and basically do that in no other way than
21 just support -- or show support in numbers.

22 And that was -- I guess that was my understanding of what it was -- what the
23 protest was supposed to be about.

24 Q Now, at any point in that, did you hear that some people might be trying to
25 go into the Capitol Building itself?

1 A Other than when we were on the lawn, as I told you about the group, and
2 they left -- I can't even remember if that was during President -- I think that was during
3 President Trump's speech. It could have been before his speech. Not exactly sure.
4 So we heard that.

5 Now, as we got closer walking down -- and, I guess, I said it was Constitution
6 Avenue, I guess, is what we were on there. By the time that we had arrived there to the
7 Capitol, I guess, was primarily after all of the bad things had happened. And so, you
8 know, you kind of had some people that were -- you know, again, you had a sea of people
9 moving towards the Capitol, an endless sea of people, you know, that were arriving, that
10 had been there, that were coming.

11 But at the same time, you had a few people -- or, you know, not a few, but
12 probably different groups that were kind of going the opposite way. And I do recall
13 now, again, with all of this, there was a girl that was crying and said that she had been
14 maced by the police up at the -- closer to the Capitol, I think it was. I mean, she really
15 didn't say how -- but that she had been maced, and she was crying.

16 Q So at some point when you were with this sea of people that was moving
17 towards the Capitol Building, you found out that there were people having confrontations
18 with law enforcement?

19 A So when the girl -- like I said, when she was crying, I particularly didn't talk to
20 her. I think it was -- and, again, I'm just trying to go on spur of the moment. A lot of
21 this, you know, kind of is coming back to me, but I don't -- the details are maybe not
22 exactly clear.

23 But the girl -- I'll just say that this girl that got maced, she did express -- again, it
24 wasn't to me -- but she expressed kind of -- or one of the more inquisitive people that
25 was with us might have asked, What happened? What happened? What happened?

1 And then this -- again, this woman that was with us came back and said, Well, she said,
2 you know, that there was a big fight up on the -- you know, up on the stairs, you know, I
3 mean, like that. So --

4 Q Can I ask you, if you remember, why you specifically named Pelosi, Schumer,
5 and Nadler?

6 A I don't, other than I would say that it was probably -- I'd just say bad feelings
7 of their representation of past events that kind of stood out to me. So I guess that's
8 maybe why -- you know, why their names were probably on the top of my head or
9 whatever.

10 Q And I want to make an assumption, but is it your view that those folks,
11 maybe among some others, but at least those three that you named, were outspoken
12 critics of President Trump at various points during his Presidency?

13 A I wouldn't say that -- I mean, you know, I guess that that's probably a better
14 way to put it than what I tried to describe it as. But that's -- yeah, that's pretty much it, I
15 guess.

16 Q Now, also in the video, you mentioned something about a police officer:
17 I've got a little present for the officer that tried to arrest me twice yesterday.

18 I think, based on the conversation you had earlier about the tour from
19 January 5th, was that related -- were you just making a comment about the fact that you
20 were wearing a mask now?

21 A I think so. And, you know, I don't know if you can follow like -- like I said, I
22 mean, listening to some of this stuff is kind of embarrassing. But I think I made the
23 comment earlier about sometimes when my mouth does get going, it doesn't stop. And
24 so I think a lot of that stuff, again, there was no thought behind the words that were
25 coming out of my mouth.

1 Q Right. And that's -- I'm just confirming that that's what the comment was
2 about.

3 A Right.

4 Q It wasn't about --

5 A You know, it wasn't -- it wasn't anything with any meaning, you know,
6 behind it. It was, again, things I said, stupid talk or just running -- running my mouth
7 when it probably should have been closed.

8 Q And I understand. And I hope you also understand that I'm not trying to
9 embarrass you. It's just questions that we feel like we have to ask given what we all
10 now know ultimately happened --

11 A Right.

12 Q -- even if it's just an unfortunate sort of coincidence that you're making what
13 you're calling sort of stupid talk with what was actually going on.

14 And so the last piece, then, that I have to ask you about is, you know, you make
15 the comment towards the end of the video: They got it surrounded. It's all the way up
16 there on the hill, and it's all the way around, and they're coming in, coming in like white
17 on rice for Pelosi, Nadler, Schumer, even you, AOC. We're coming to take you out and
18 pull you out by your hairs.

19 And then you make a comment about: When I get done with you, you're going
20 to need a shine up on top of that bald head.

21 Again, I'm not -- does that fall into this category of what you have described as
22 stupid talk from that day?

23 A Yes, I would definitely say so, stupid talk and, I mean, just -- if you can follow
24 me again where almost like a rant, you know, where something -- and I mean, you know,
25 whatever. It -- you know, things just started flowing out of me, you know, with, like I

1 said, the passion and the feelings and things, you know, of everything that was
2 happening. But no, I guess, you know, specific or, again, intentional desire to fulfill any
3 of that, just, you know, sometimes I guess it's referred to as, you know, whatever, big talk
4 or whatever, but, yeah, dumb words.

5 Q Now, you did not go into the Capitol, did you?

6 A No.

7 Q How close did you get to the building itself?

8 A So in that video, I think, I'm going to say is probably the closest we got,
9 which I know it's kind of maybe hard to tell. Maybe it doesn't show exactly. But I'm
10 going to guess maybe someplace between 100 to 200, possibly 300 yards. I mean, we
11 were definitely close enough to see the building, but like no place, you know, up where
12 we could touch it or even -- you know, probably couldn't even thrown a baseball and hit
13 it, you know, from where we were.

14 Q So, you know, from the direction you were coming, do you remember if
15 there were any roads or fountains or anything between you and the building -- or you and
16 the lawn, I guess, that goes up the hill to the Capitol?

17 A I think so. I think from the road that we traveled down, I think that -- like,
18 we came down, I guess that was Constitution, and then I'm just asking because I'm
19 not -- again, I'm not familiar. It seems like that might run into like a circle kind of maybe
20 where other roads converged. Is that correct?

21 Q Yeah, that's consistent with the layout of the streets there in that part of
22 town.

23 A Okay. So we crossed -- probably just crossed, like, that section. So
24 whatever that is, you know. Again, with so many people, it's kind of hard to tell what
25 was, you know, beyond there, if there were any -- I think you mentioned fountains or

1 sidewalks. It's hard to tell.

2 We were over off to the left side if you were standing facing the Capitol. So we
3 were on kind of the left side in the field -- in a field. And, I mean, there was a few
4 people around there, not many. But like I said, you know, most of the people were
5 either on Constitution or maybe coming from these other side streets and then up around
6 the Capitol in kind of all directions but not necessarily on the Capitol. I couldn't tell, but
7 definitely out on the lawn areas kind of as we were.

8 Q Did --

9 A There were definitely, I mean, you know, people that you could tell that
10 were, you know, trying to get as close as -- I'll just phrase it that way -- get as close as they
11 could to the actual Capitol.

12 Q And did you see anybody engaging in fights while you were there?

13 A No.

14 Q And did you see any law enforcement in the area while you were there?

15 A Well, the one thing that I did saw -- and I don't know if -- again, I thought I
16 had videos of this, was -- so -- and I guess it -- so President Trump's speech was in front of
17 the White House. And then from where we were, again, you know, off on the various
18 sites, on the tops of the various buildings, particularly while we were there watching the
19 speech -- the speeches and there on the lawn in front of the Washington Monument, you
20 could see around on top of some of these buildings -- and I think somebody -- I don't
21 know -- somebody, I think, might have told me that one of them may have been the FBI
22 building. I don't know. But there were different -- I would say they were snipers on
23 top of the buildings, not -- but as far as law enforcement or whatever, there like in the
24 vicinity or whatever, that was it, until afterwards.

25 Until after -- after everything happened at the Capitol, then, yes, then they were

1 all over the place. I mean, it was sirens and -- you know, prior to anything happening or
2 anybody arriving at the Capitol, no, no real police, other than, like I said, what I would call
3 or guess -- I mean, I just guess, walking around up on the roofs with, you know, rifles.
4 And that was on several of the buildings. And like I said, I thought I had videos of that.
5 I don't know if you saw those or not.

6 Q So there's -- you did send us some more videos of just being in the area, sort
7 of that you've been describing near the Capitol Building. There's one that shows you
8 and your group essentially leaving the Capitol area and walking towards, I think, like a
9 lunch stop or a deli, some kind of restaurant. That was about 30 minutes after the video
10 that we just watched when you're talking about the people all -- the sea of people sort of
11 going towards the Capitol.

12 I'm curious, what caused you and your group to leave the National Mall area and
13 walk away?

14 A Well, one reason I could say that we probably even hung out as long as we
15 did, the one gentleman -- and at that time I think it was only me and this one other
16 gentleman together that was with our actual group from Atlanta. Again, we got
17 separated. You know, some people went some way. They left earlier or whatever.

18 But this guy that we kind of stayed together, he had some friends from a church or
19 a prayer group or something that were also there in Washington, D.C., that, I guess, you
20 know, he knew that they were going to be in the area. So he was -- you know, he calling
21 them, trying to call them and was able, I guess, to make contact and find out that -- you
22 know, find out that they were coming that way.

23 And so that's why we -- that's why we waited, because he actually did and was
24 able to meet up with -- there were two other gentlemen. And then once they got there,
25 that's basically when we just went and got lunch.

1 Q And after lunch, where did you go?

2 A I think that's when we tried to start finding our way back to the bus, and we
3 were kind of -- we were lost, and I think probably -- yeah, I think we probably had an idea
4 of where we were going, but basically we were lost. So, I mean, if you want to say we
5 were wandering, or whatever, we were trying to just get to a spot. Again, like I said, I
6 mean, it was hard to get any sodas. We realized that we were really close to the time
7 that we needed to be back to our buses, and we didn't know where it was.

8 And so, you know, again, we were trying to call other people, but at that time -- I
9 mean, again, I don't know if signals were jammed in the area or whatever, it was
10 impossible to make, you know -- or really hard. It wasn't impossible because, like I said,
11 we were able to make a few calls, but it was hard to make calls. You know, streets at
12 that time had begun to be blocked off and a lot of things.

13 So it was -- that's why I'm saying that's where it kind of started to get even -- for
14 us on a personal level -- I mean, I guess not chaotic at all as to the events that happened
15 maybe a few hours prior, but for us, like I said, that was kind of a scary moment. Like I
16 said, we miss our bus ride back to the campground, you know, what are we going to do?

17 Q Right. So was the plan to leave D.C. to head back south that same day or
18 was there going to be another night at the campground first?

19 A I'm -- honestly, again, I'm not sure what we did. I want to say that we
20 stayed the night again at the campground. Yeah, I'm -- and, see, this is what I'm saying,
21 a lot of these details, like some of these little things, I mean, I just -- I mean, I can't even
22 tell you exact -- I couldn't tell you exactly when we left. I couldn't -- you know when we
23 left from Atlanta. I can't tell you exactly when we headed back. I don't think it was the
24 night of the 6th.

25 I want to say it was the next -- you know, like early the next morning we probably

1 left out, I don't know, maybe 5:00 or 6:00 in the morning. But I don't know, again, if
2 that's entirely correct. That's what I want to say.

3 Q Now, to the best of your knowledge, did anyone from the bus group that you
4 were on go into the Capitol Building on January 6th?

5 A No, not that I'm aware of. Besides anybody that was on my particular bus,
6 I had no idea who anybody was. I mean, I -- excuse me. I couldn't tell you at all.

7 Q And so then have you heard about anybody from this bus group being
8 charged with a crime related to January 6th?

9 A No.

10 Q Okay. Now, I want to just ask you a couple more questions here specifically
11 about the interview that you've alluded to several times. I think you said that you
12 were -- and you provided for us a photograph of a business card from a Federal agent
13 from Homeland Security Investigations. Is that accurate?

14 A Yes.

15 Q And so tell us about how that interaction -- how that interview came to
16 happen.

17 A Well, I mean, you know, they just -- they showed up at the door, you know,
18 one day. I answered the door -- well, actually my wife answered the door. And, you
19 know, they introduced, I guess, themselves and asked for me. So my wife -- you know,
20 my wife came and got me, and I met them at the front door. We stayed outside.
21 Again, they introduced themselves and said, you know, I mean, we're here. We want
22 to -- again, I don't recall the exact conversation, but the gist of things, that we want to ask
23 you a few questions about January 6th. And so I said, you know, I said, sure, that's fine.

24 And so they asked some various questions, kind of in the same format as what you
25 are a little bit as far as, you know, I mean, what -- you know, they knew that I was in

1 Washington, D.C., again, you know, which I wasn't trying to keep any type of secret. But
2 I guess they just wanted me to know that, that they knew and stuff. And I said, you
3 know, sure. And so they wanted to know basically the same format that you've asked,
4 you know, how did I get there, you know, about the group, the same similar questions.

5 And, again, I was trying to provide them as much information to the questions or
6 any additional information that I could think of with anything to them. And, again, I
7 don't remember all the exact specific -- I know that there were two agents, I guess likely
8 more accurately to refer to them as, that were there.

9 And, again, the one thing particularly that sticks out in my mind about that
10 conversation or interview or whatnot is that, you know, they had particular interest in the
11 video getting off the bus and the Facebook video.

12 Q The one with Danny Hamilton making the comment about the end of his flag
13 pole?

14 A Yes.

15 Q Do you remember when this law enforcement interview took place?

16 A Exactly, no. The summer of 2021, I would say, maybe June or July. I don't
17 think it was past there. I don't think it was before there. But, again, I'm not 100
18 percent certain.

19 Q Did you talk with Mr. Hamilton about the law enforcement interview
20 afterwards?

21 A No. No, I haven't spoken or had any conversation with Mr. Hamilton. I
22 know that there was -- again, coming through, you know, just posted on Facebook or
23 whatever, there was some type of event that was supposed to take place for him. You
24 know, again, I don't know what it was. It was a birthday party, some type of an event
25 that was basically sponsored not by him but by somebody else who was doing this for

1 him. I can't remember all the information. And it was at the same restaurant that we
2 met at to leave Atlanta on the morning to head to D.C. And, I mean, you know, I
3 thought about, you know, attending that, but I didn't.

4 Q And I think [REDACTED] asked you this earlier, but have you been contacted by
5 Representative Loudermilk's office or anybody else who was on that tour of the Capitol
6 office building since January 6th?

7 A No.

8 Q Now, I'm going to pause in a moment and just see if any of my other
9 colleagues have any other questions for you. I'm basically done with all the questions
10 that I had.

11 Before we formally sort of end things, though, I want to make sure to give you an
12 opportunity, Mr. Hallgren, to say anything for the record that you want about any of the
13 stuff that we've discussed today.

14 A Um --

15 Q You don't have to. It's just your opportunity just to add anything that I
16 might not have asked about.

17 A Nothing to add. Again, you know, I mean, I know that you said that you
18 weren't trying to embarrass me, but, you know, I mean, I just want to, I don't know,
19 maybe make an apology about some of the things I said. I mean, it was -- it's not
20 actually very characteristic or representative. Like I said, I know that I'm very passionate
21 about the way that, you know, I have felt about politics, I guess, you know, in the recent
22 years. And I think that's probably where a lot of that was driven from.

23 But, yes, so -- yeah, that's -- it was kind of weird to actually have to sit and listen to
24 that.

25 Q Yeah, I understand. I appreciate that. I do.

1 I am curious, you know, just because we have you here and I said we'd be done by
2 1 o'clock and it's 12:55, so I feel like I have another minute to ask you.

3 A Sure.

4 Q In the, you know, year plus since January 6th, has your perspective on
5 President Trump or the 2020 election or Congress changed at all?

6 A You know, I've just been so busy. I mean, I don't -- I don't know how to
7 give you that answer. I mean, I still have feelings about it. But, in all honesty, I've got
8 a hundred and more other things going on that I just know that I need to put my
9 attention on those other things and, you know what I mean.

10 Again, although I didn't agree, you know, with the way that things happened, you
11 know, I mean, I kind of -- obviously, I went to Washington, D.C. and things like that, but, I
12 mean, you know, I participated in some of the stuff. And I think it's there in my head,
13 you know, I mean, to just let bygones be bygones. I mean, you know, there's -- you
14 know, the future's ahead. And with the future being ahead, like I said, I have -- I just
15 have a lot of things -- I mean, my school. My wife and I have a particular situation, you
16 know, that we have to deal with. So, I mean, there's things that I need to be more
17 focused on.

18 And I think that's a good thing, though. I think that's a good thing because, you
19 know -- I don't know -- I mean, maybe I would still be doing stupid talk or whatever.
20 But, you know, thanks to a lot of these other things -- well, that they are, I
21 guess -- thankfully, it's kind of taken my mind from that stuff.

22 Q And I appreciate that very much. And I hope that you and your wife and
23 family and your education are all, you know, bright horizons in your future with lots of
24 good things to look forward to.

25 A Thank you.

1 [REDACTED] I see [REDACTED] has popped back on.

2 [REDACTED] do you have any other followup?

3 [REDACTED] No. I was just going to echo what you said. I know that spending
4 couple of hours with us this morning is probably not what you had hoped to do with your
5 day, but we genuinely appreciate how forthcoming you've been with us, and I'm glad
6 we're getting you out of here on time hopefully to get back to your class.

7 The Witness. Yes. Thank you. Thank you.

8 [REDACTED] What I'll do, Mr. Hallgren, because today there were several
9 instances, I think, where we were showing you things for the first time and things that
10 were refreshing your recollection, what we'll do is we'll ask that you go back one more
11 time and just see if you can find any additional photos or videos, particularly from the
12 Capitol tour, and follow up with you after this. And if it turns out the answer is no, you
13 don't have any, then it is what it is. But maybe because of the way that we -- you know,
14 who knows what will be jostled loose in your memory here in the next day or two.

15 So we'll be back in touch with you on that. But otherwise, I fully expect that
16 unless there's some kind of new piece of information that you dislodge for us, I think
17 we're largely done speaking with you on these topics. We would like to receive any
18 photos or videos that you do have, so we'd ask for you to go back and doublecheck on
19 that.

20 The Witness. I'll look -- you know, I mean, when I got the subpoena -- and I
21 guess it's a good thing that I did this -- you know, again, I was concerned obviously, and I
22 wanted to make sure that I was trying to comply with everything. So -- and, fortunately,
23 I did. I went to a computer place, and I had the guy pull all those videos, as I explained
24 to you the first time, on a thumb drive, and thankfully he did because -- and that's how I
25 got those to you.

1 So that wasn't -- I mean, I paid to have that done, and it all wasn't cheap for me.
2 But, again, it's what had to be done. So, you know, I mean, it's what had to be done.
3 And it worked out good like that. But he -- you know, he kind of went through the
4 phone, and we searched it. I mean, I can try to bring -- but I don't know how to do
5 anything else with the phone. And like I said, the only things I can think -- now, like I
6 said, there were a lot of things that we went over today and I saw that, yes -- I mean,
7 just -- you know, I mean, they happened. They happened over a year ago, and they're
8 forgotten, you know. A lot of it I do remember, and when I saw pictures of things, I was
9 able to recollect.

10 The biggest thing I want to say is the pictures in the -- from the Rayburn Building
11 and stuff, like I said, I mean, is a big mystery. And so I will check to see if there's
12 anybody that has an idea what could have happened to those, and look at things and see
13 if maybe they can find them, but -- and I will go back and look again, but I think that I did
14 a fairly thorough job. I mean, it was hard. And I'll try to go back. You know, I mean, I
15 did go through quickly, you know, texts and things like that, but it wasn't hard to do. I
16 don't have a lot of texts and things like that, you know, so it wasn't really hard to look for
17 those. The biggest things would just be photos. And the only ones that I can think,
18 again, that would be missing would be from the tour on the 5th.

19 [REDACTED] Well, I don't think we want you to have to go back to the computer
20 store, but if you do see things that are helpful for us from what we've discussed, or you
21 can take a look through your own devices again, that would be helpful.

22 [REDACTED] I don't know if you have anything else to add to that.

23 [REDACTED] No. I think that's it. And he's exactly right, Mr. Hallgren, we're
24 not asking you to go and, you know, at great expense and additional time and resources
25 to figure out something that's not there. We'd just ask you, after today, just take one

1 more look, and if there's still nothing there, then we'll be satisfied with that.

2 But sometimes when we interview witnesses and new information comes out or
3 something just -- you know, the following day they realize, oh, I should have looked at this
4 place or that.

5 So we'll follow up with you in a few days about it, but until then, we have no
6 further questions for you.

7 So the deposition will stand in recess, subject to the call of the chair. And we can
8 go off the record.

9 [Whereupon, at 1:03 p.m., the deposition was recessed, subject to the call of the
10 chair.]

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Certificate of Deponent/Interviewee

I have read the foregoing ____ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

Witness Name

Date